the Parker company

MORENCI, MICHIGAN 49256, PHONE (313) 458-2224

June 18, 1974

RECEIVED
JUN 19 1974
DEPT. OF NATURAL RESOURCES
PTE. MOUILLEE S. G. A.

Dept. of Natural Resources
Water Resources Commission
Pointe Mouillee State Game Area
R.F.D. #2
Rockwood, Michigan 48173

Attn: Mr. John Bohunsky, Reginal Engineer
Mr. Wayne E. Denniston, P.E.
Mr. Roy E. Schrameck, P.E. ✓

Gentlemen:

Thank you for your letter of May 10, 1974 concerning the accidental spillage at our Morenci plant.

We are happy to report that the new sewer line was completed by June 15, 1974 and the emergency overflow line to the creek has been permanently plugged with concrete. We now flow all wastes to our combined waste sump, as shown on the sketch attached to my letter dated April 19, 1974.

We anticipate no more difficulties and are also taking steps within our process to eliminate operator error as you discussed. Unless I hear from you I shall consider this file closed. Thank you.

Very truly yours

Richard G. Speed

Richard G. Speed, P.E.
Manager of Plant and
Industrial Engineering

RGS/jh

cc: R. Dube
J. Wilkenfeld
A. Katona

THE SPEED COMPANY

MORENCI, MICHIGAN 49256, PHONE (313) 458-2224

April 19, 1974

Water Resources Commission
Department of Natural Resources
Steven T. Mason Bldg., 8th Floor
Lansing, Michigan 48926

Attn: Robert Courchaine, Chief Engineer

Gentlemen:

The attached report and sketch detail an emergency spillage which occured at our Morenci, Michigan plant on April 18, 1974 at 10:30AM. As stated in the report this was the result of an operator error in overfilling a storage tank. Through a combination of circumstances a spill of approximately 800 gallons of a dilute solution containing sodium phosphate, sodium carbonate and small amounts of zinc phosphate occurred.

We have since cleaned out the sump to keep the existing sump pump operable as shown on the sketch. We have a new sewer line ordered which will eliminate the present pumping requirement, and we believe this will correct any deficiencies. The overflow line to the river will then be permanently capped.

On the afternoon of April 18, 1974, Messrs. R. Schrameck and C.C. Bikfaloy of the Water Resources Commission visited the plant site and were given a tour of the area. We explained the situation to their satisfaction and they indicated agreement with our plan.

Very truly yours

Richard G. Speed

Richard G. Speed, P.E.
Manager of Plant and
Industrial Engineer

RGS/jh

cc: R. Dube
J. Wilkenfeld
A. Katona

Attachment

: WED

THE PARKER COMPANY ACCIDENTAL SPILLAGE REPORT

DATE 4-18-74

LOCATION Morenci, Michigan Plant

PERSON REPORTING Richard G. Speed, Manager of Plant and Industrial Engineering

DECRIPTION AND CAUSE OF SPILL(s) Operator overfilled tank which flushed into sump overfilling sump. Emergency overflow went to The Tiffin River (Bean Creek) causing white precipitate of soda ash and some dilute zinc phosphate.

ESTIMATE OF SPILLED QUANTITIES (LBS) 800 gallons dilute sodium carbonate and phosphate in water slurry.

ACTION TAKEN TO ABATE POLLUTION Installing new sewer line to main collection sump.

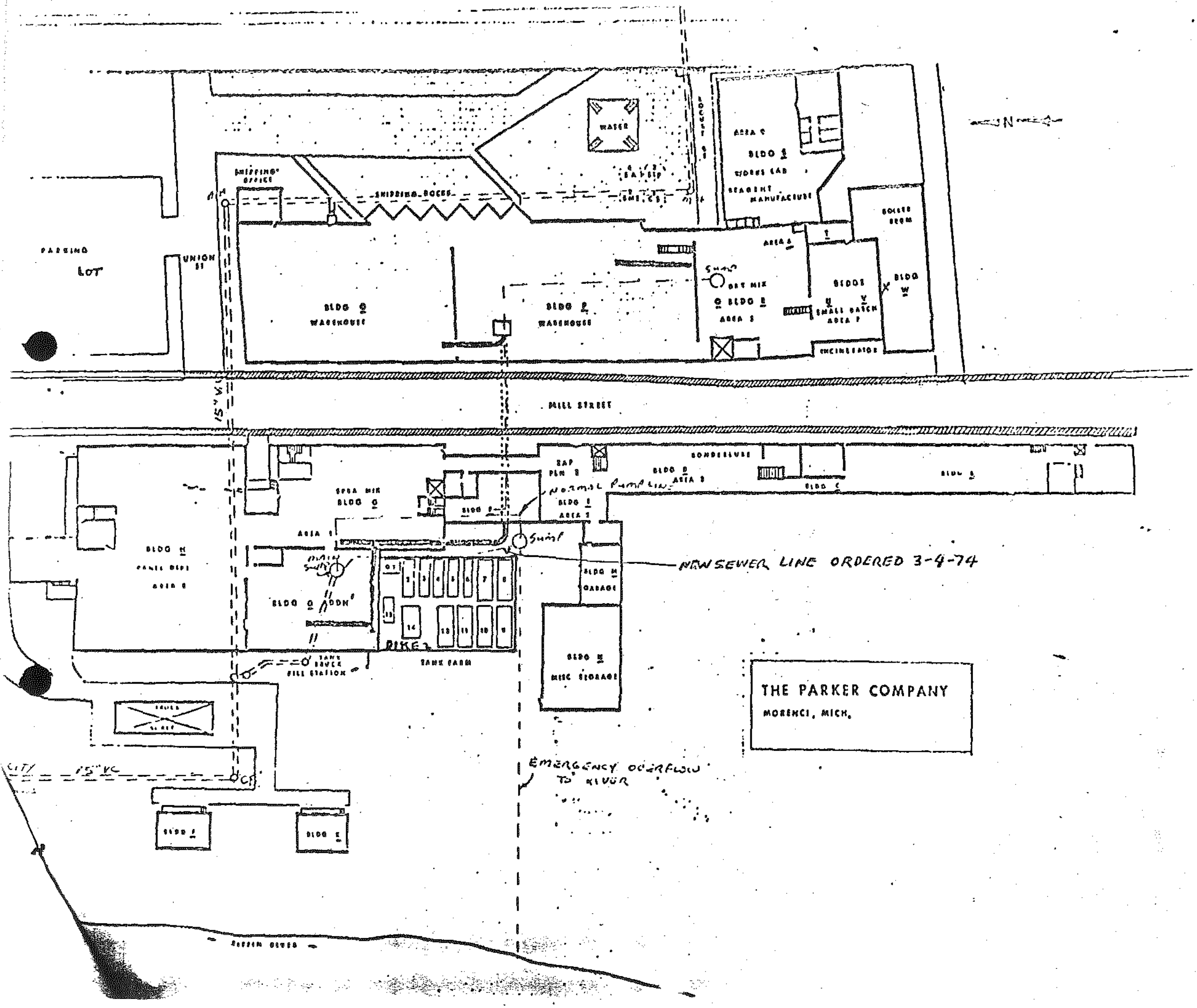
AGENCIES CONTACTED IN REGARD TO ACCIDENTAL SPILL

Frank Baldwin (TEL: 571-373-1947)
Regional Water Quality Administrator
Department of National Resources
District No.1
Rockwood, Michigan

A. Katona
Environmental Health
Hooker Chemical
Niagara Falls, N. Y. 14302

---

rameck and C.C. Bikfaloy - Viewed site on 4-18-74
sources Commission
of Natural Resources


THE PARKER COMPANY
MORENCI, MICH.
NEW SEWER LINE ORDERED 3-4-74
EMERGENCY OVERFLOW TO RIVER
Normal Pump Line
Sump
Main Sump
DIKE
MILL STREET
PARKING LOT
UNION ST
WATER
SHIPPING DOCKS
SHIPPING OFFICE
BLDG Q WAREHOUSE
BLDG P WAREHOUSE
DRY MIX
AREA C
WORKS LAB
REAGENT MANUFACTURE
BOILER ROOM
INCINERATOR
SMALL BATCH
TANK FARM
TANK TRUCK FILL STATION
GARAGE
MISC STORAGE
PANEL DEPT
SPRA MIX
BONDERLUBE
15" VC
CITY

WATER RESOURCES COMMISSION
Memorandum

To: W. Denniston

From: R. Schrameck

Date: 4-18-74

SUBJECT: Zinc Phosphate loss to Bean Creek
Parker Company
Morenci

Chuck Bikfalvy and the writer received a call in Adrian from Wayne Denniston, District Engineer, at about 1345 on this date that the Parker Company in Morenci had accidentally lost an unknown quantity of zinc phosphate, sodium phosphate and acid to Bean Creek. The Company discovered the loss about 1030 and as soon as they ascertained the material might reach Bean Creek, they activated their incident plan and notified Lansing at about 1055. Mr. Richard Speed, Manager of Plant and Industrial Engineering, attempted to contact Messrs. Bohunsky or Baldwin but they were not available. He left a message that the Company had an accidental spill to the Creek but due to faulty communications his call was not returned until sometime after 1300.

We proceeded to Morenci immediately and checked Bean Creek at Morenci Highway in Morenci. The creek appeared normal and had a litmus paper pH of about 7. There were no signs of dead or dying fish in the area.

Mr. Speed relayed the following information about the incident.

The Parker Company, a Division of Oxy Metal Finishing Corporation, formulates surface conditioners such as cleaners and phosphate coaters for the metal finishing industry. They have about five heated mixing-storage tanks for zinc phosphate in the basement of one of their buildings. An operator overfilled one of these tanks by about 800 gallons and the material flowed over the floor to a drain and then to an outside collection sump. The volume of material exceeded the capacity of the lift pump in the collection sump and flowed to the creek via an old cracked roof header drain. This sump normally collects waste waters from surrounding sections of the plant and storm water and conveys it to the main collection sump by use of the sump pump. All process and cooling waters, as well as storm water run off from the plant area, is normally discharged to the municipal sanitary system and on to the Morenci sanitary lagoon system.

Mr. Speed indicated that the sump contained sodium carbonate, lime and sodium hydroxide. He felt that when the hot zinc phosphate hit the cold water solution in the sump that the zinc probably dropped out and the pH was nearly neutralized. The quantity of sludge they had to remove from the sump verified this theory to him. He indicated that the material discharged to the creek was a white turbid flow and felt that it would be primarily calcium phosphate and/or sodium phosphate. He had no idea how much of the 800 gallons actually reached the creek.

Bureau of Water Management and

WATER RESOURCES COMMISSION

Memorandum

To: W.Denniston

From: R. Schrameck

Date: 4-18-74

SUBJECT: Zinc Phosphate loss to Bean Creek
Parker Company
Morenci

There was no discharge from the creek outfall when we arrived.

Mr. Speed showed us a purchase order written on 3-4-74 to install a gravity sewer from the sump in question to the main collection sump thereby eliminating the pump. He also said he would plug the old sewer going to the creek. They have apparently been waiting on the contractor to install the necessary sewer connection. This should eliminate this type of incident in the future. Mr. Speed was advised that he must file a written report with the Commission within ten days and that he should indicate the pending construction in this report.

After leaving the plant, we checked the bridge crossings on Bean Creek for a distance of about five miles downstream. Although the turbidity in the stream seemed to increase slightly downstream, there was no discernible pH variation and no indication of any dead or distressed fish in the creek.

Mr. Speed told us that shortly after he called Lansing, people were observed sampling Bean Creek at Morenci Highway. It appears that this may have been the sampling crew from Comprehensive Studies, and this data will be checked when available to determine if any changes in water quality were noted.

No further action is indicated on the part of staff at this time.

cc: John Bohunsky
RS:gm

STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

Pointe Mouillee State Game Area
RFD #2
Rockwood, Michigan 48173
May 10, 1974

Mr. Richard G. Speed
Manager of Plant and Industrial Engineer
The Parker Company
Monrenci, Michigan 49256

Dear Mr. Speed:

Receipt of your April 19, 1974 incident report is hereby acknowledged. We would like to thank you for your immediate attention to notification of our agency and submittal of your incident report.

The corrections outlined in your report and cover letter should adequately prevent this type of loss from reaching Bean Creek in the future. We would request correspondence from you indicating when the new sewer line is installed and when the by-pass line to the river has been plugged. We would hope that as the contract on your new sewer was let on March 4, 1974, that sufficient pressure can be exerted on the local contractor so that the line is installed by no later than July 1, 1974.

In addition to your proposed corrections, we would suggest that you consider the possibility of high-level alarms on your mixing tanks or possibly interconnect overflows among your tanks so as to utilize all available storage in the event another overfill does occur. This would serve to give added protection to the Company and municipal sewer systems in the event of a future mishap.

If you should have any questions regarding this correspondence, please feel free to contact this office, or Mr. John Bohunsky, Regional Engineer, in our Lansing office.

Yours Truly,

WATER RESOURCES COMMISSION

Wayne E. Dennistun

Wayne E. Dennistun, P.E.
Basin Engineer

Roy E. Schrameck

Roy E. Schrameck, P.E.
Assistant Basin Engineer

cc: John Bohunsky
RS:gm

HST-a1

MICHIGAN WATER RESOURCES COMMISSION

Memorandum

To: Frost and Files

From: G. Calhoun

Date: 9-15/64

Re: Hooker Chemical
Parker Rust Proof Div.
Morenci

Mr. Van Falkenburg, Manager, contacted. All wastes except cooling water (50-60,000 gpd.) and a barrel washer (200 gals. of 50% caustic dumped on Wednesday and Friday) is discharged to Morenci STP. The cooling water and caustic wash also containing phosphates from residues left in drums can very easily be connected to the Sewer System. Mr. Van Falkenburg is to make arrangements to either have City make connection or to have Company do it. He is to contact us by letter when arrangements have been made. We should hold off any survey until we know what they are going to do. I told him I would expect a decision by 10/1 and completion shortly thereafter.

hmc
cc--G. Calhoun ✓

File
Morenci

Parker Rust Proof Div
Hooker Chem. Corp

Company

Morenci

Phone GL 458-2224

Contacts Van Valkenberg - Mgr
R. Harris - Chem
M. Schultz - Supt.

1961
1962
1963
1964
1965

Rec. Stream Bean Creek

Supply Source 2-wells no city Amt. 50,000 gpd.

ype Order Date

Restrictions

Sanitary Disposal to City

Ind. Treatment Desc. Treat Cr6 w/Bisulfite
Control PH.

Insp. Date	Remarks	Memo to File
	wastes - Tank washings Chromic Acid - dil. → Tank Phosphoric Acid Nitric Acid Caustic Soln.	

MICHIGAN WATER RESOURCES COMMISSION

Memorandum

To: F. B. Frost and G. Calhoun

From: R. M. Purdy

Date: July 27, 1964

Re: Report of Fish Kill in Bean Creek at Morenci

I attempted to contact Mr. Clark late in the afternoon of July 23 but he had left his office. I talked to Mr. Apgear of the Ohio Division of Wildlife at the Columbus Office. He had very little additional information and referred me to the Findlay Office. I contacted Walter MacMillland, the District Supervisor of the Findlay Office. He reported that they first received information of dead fish in Bean Creek on the morning of July 23. A farmer living near the Ohio-Michigan line reported the fish kill to their District Game Protection Branch. Investigation disclosed the probable time of the fish kill as July 17.

Dead fish were noted in all points of the stream. At appeared that the dead fish were limited to an area beginning in Morenci and ending some 200 yards from the Ohio line. It was their investigators opinion that the killing was caused by a toxic waste from what they believe to be a wire manufacturing company in Morenci. A complete report of their investigation will be forwarded to this office.

Investigation should be made to determine if waste control is needed at any of the industries in Morenci. A municipal sewage treatment facility is now under construction.

bmc

James A. Rhodes
Governor

Fred E. Morr
Department Director

Dale E.
Divisio

Jack F. K
Assistan

Carl L. Mo
Adm. Ass

DIVISION OF WILDLIFE
DEPARTMENT OF NATURAL RESOURCES

July 24, 1964

RECEIV

JUL 27 196

WATER RESOUR
COMMISSION

Mr. Ralph Purdy
Michigan Water Resources Commission
Station B
Lansing, Michigan

Dear Mr. Purdy:

On July 23, 1964, by public service, I advised that I would forward a copy of our game protector's investigation report on his pollution investigation in Beaver Cree in Fulton County, Ohio this date. Mr. Marvin Rittenhouse, our Fulton County Game Protector, has had to delay this report due to his incapacitation resulting from a broken arm sustained during his investigation. In order to provide you information at the earliest possible date, I have summarized our knowledge of this pollution as follows:

Mr. Dale Johnson, a rural resident of Fulton County, Ohio, located within one mile of the Ohio-Michigan line on Fulton County Road "T", advised Mr. Rittenhouse on July 22, 1964, that he had observed dead fish and other fish in distress in Beaver Creek on his property on Saturday, July 18, 1964. At the time of his investigation on July 22, Mr. Rittenhouse found no dead fish in Ohio. However, upstream observati indicated the presence of dead fish in the stream in Michigan. Mr. Rittenhouse foun that dead fish were present to the outlet drain of the Parker Rust Proof Division of Hooker Chemical Corporation at Morenci, Michigan. He obtained five water samples from the stream at different locations and a sample from the drain of this corporati These samples have been taken to our laboratories in Columbus for analysis. This analysis information can be provided to you as soon as available.

A similar fish kill in this stream was reported by Mr. Dale Johnson and investigated by Marvin Rittenhouse and Carl Baker, one of our fisheries biologists on June 24, 1963 During this investigation, it was found that dead fish were present both in Ohio and Michigan and it was determined at this time that the source was the Hooker Chemical Corporation. During this investigation, a Mr. Robert Sallows of a Morenci rural address was contacted and he advised that the company appears to place wastes into the stream on Tuesdays and Thursdays. He also advised that once a year usually during mid-summer, they apparently clean their facilities and place large quantities of waste materials into the stream.

It is hoped that this information will be of assistance to you. As soon as more detailed information is available, we will be pleased to provide it to you.

Sincerely yours,

Darrell Allison

Darrell Allison
Fish Management Supervisor
Wildlife District Two
957 Lima Avenue

MICHIGAN DEPT. OF NATURAL RESOURCES, ENVIRONMENTAL LABORATORY ANALYSIS -- ORGANICS - PETROLEUM PRODUCTS - ORGANIC LIQUIDS

LAB LOG# 9458 PROJ CODE HE COST CENTER ------- PR --- COLLECTED BY L. Koivuniemi, R. Schramek TRANSFERED TO ----------- RECIEVED AT LAB ---- EXAMINER ----

LOCATION SAMPLED Hooker Chem - Parker; Unsewed SAMPLE REMARKS ---------- SEND RESULTS TO (NAME & SECTION) L. Koivuniemi, AQD Ann Arbor

"DO NOT PUNCH"

FIELD	DESCRIPTION OF SAMPLING SITE OR SAMPLE	REF NO.	STORET NUMBER	START DATE YYMMDD	TIME MIL HHMM	LAB NO. 1 P00008	INFRARED SPECTROSCOPIC CHARACTERIZATION FUNCTIONAL GROUPS PRESENT	COMPARISION
	#1 Tank Solvent	I01				16110		
	~~#2 Surfactant, phosphate~~	I02						
		I03						
	#3 70% Ethylamine - waste	I04				16112		
	#4 Oil + Emulsifier	I05				16113		
		I06						
		I07						
		I08						
		I09						
		I10						

	GAS CHROMATOGRAPHIC CHARACTERIZATION MAJOR SOLVENTS PRESENT	COMPARISION	PETROLEUM PRODUCT ID
	[Poss. Scan 4]		
1	Mixture including ethyl benzene and xylenes		
2			
3	1242 1254 1260		
4	Trace xylene		RECEIVED
5	Toluene, ethyl benzene and xylene K4000 K2000 K2000		
6			JUN 24 1982
7			
8			WATER QUALITY DIV. DIST.
9			
0			

ESD - 4400 5/82

PRC Environmental Management, Inc
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

HST-005

PRC

RCRA TREATMENT, STORAGE, AND DISPOSAL FACILITIES CORRECTIVE ACTION PRIORITIZATION

FINAL REPORT

ATTACHMENT 1

CUMULATIVE SCORING SUMMARY FOR 1,696 FACILITES

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No.	:	R05001
EPA Region	:	5
Site No.	:	Various
Date Prepared	:	September 30, 1994
Contract No.	:	68-W4-0007
PRC No.	:	070-R0500101PR
Prepared by	:	PRC Environmental Management, Inc.
Contractor Project Manager	:	Shin H. Ahn
Telephone No.	:	312/856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	312/886-4448

HENKEL CORPORATION, PARKER AND AMCHEN (MID 058 723 867)

Henkel Corporation, Parker and Amchen, formerly Parker Surface Treatment Products, produces metal-treating chemicals. The facility is located in Morenci, Michigan, and has been in operation since 1928. Extensive site contamination has been documented, probably as the result of improperly stored drums. These drums were removed in 1982. The facility is presently permitted to store 15,000 gallons in containers (S01) of D001, D002, D003, and D007 listed wastes. Henkel has submitted a closure plan for their container storage area.

The groundwater route was scored based on limited data indicating the presence of heavy metals such as lead, zinc, and cyanide in the aquifer of concern. The metals were contained in improperly stored, leaking drums. The groundwater is the drinking water source and wells are located 50 yards from the site.

Henkel does not maintain an NPDES permit. Heavy metals and PCBs were detected in Bean Creek, which runs along the site boundary. The contamination detected in the creek was probably the result of reported leaking barrels. The use of Bean Creek for recreation is assumed. The distance to a sensitive environment is greater than 2 miles from the site.

No observed release was scored for the air route. The facility does have an air operating permit. However, no permit violations have been documented. Drums located outdoors did not have covers and because baghouse dust fiber packs were strewn across the property. Several organics are stored in these drums. Residences are located within 1/4 mile of the facility.

On-site contamination from PCB and heavy metals was observed. The access to this site is unrestricted.

References:

Parker Chemical Co. 1988. Revised Closure Plan. May 12.

MDNR. 1985. CERCLA PA of Parker Surface Treatment Products, Morenci, Michigan.

EPA. 1990. RCRA Part A Permit and Compliance Files.

PRC. 1994. "NCAPS Information Request - Michigan." Received by Facsimile from MDNR on February 14.

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

HENKEL CORP. PARKER AND AMCHEN

EPA SITE NUMBER: MID 058723867

MORENCI, MI

SCORED BY: DONNA STROKA/ NICK NIGRO

OF PRC EMI

ON 03/18/94

GROUNDWATER SCORE	:	88.46
SURFACE WATER SCORE:		60.23
AIR ROUTE SCORE	:	20.66
ONSITE SCORE	:	85.71

MIGRATION SCORE	:	69.33

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: LEAD

TOXICITY/PERSISTANCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0
DRUMS : 2163

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.4

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Y

IS THERE A PERMITTED OUTFALL?

HAVE THERE BEEN PERMIT VIOLATIONS?

ROUTE CHARACTERISTICS

FACILITY LOCATION: NA

24-HOUR RAINFALL: NA

DISTANCE TO SURFACE WATER (MILES): NA

PHYSICAL STATE: NA

CONTAINMENT: NA

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTANCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS:	0
DRUMS :	2163

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.4

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 3.0

EPA ID NO. : MID 058723867
HENKEL CORP. PARKER AND AMCHEN

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTANCE VALUE: 3

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0
DRUMS : 2163

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 3.0

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: UNLIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM, PCBS & HEAVY METALS

TOXICITY/PERSISTANCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.20

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

PRC Environmental Management, Inc
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

HST-005

PRC

RCRA TREATMENT, STORAGE, AND DISPOSAL FACILITIES CORRECTIVE ACTION PRIORITIZATION

FINAL REPORT

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Prepared by	:	PRC Environmental Management, Inc.
Contractor Project Manager	:	Shin H. Ahn
Telephone No.	:	312/856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	312/886-4448

PRC PA/VSI Report - Henkel - 1994.
for CA Ranking on Priority List.

HENKEL CORPORATION, PARKER AND AMCHEN (MID 058 723 867)

Pre-Ass / Visual Site Inspection

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DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

ESTABLISHMENT - (Formerly Parker Chemical)	NO.	DATE MM/DD/YY	
Hooker Chemicals and Plastics Corporation	B-2422	05-14-82	
NUMBER AND STREET	CITY	QUARTER	NO.
322 W. Main Street	Morenci	MAY	02
CONTACT	TITLE	STAFF	NO.
Richard Fredrick	Prod. Sup't.	L. Koivuniemi	97
PRIMARY ACTIVITY		COUNTY	NO.
Chemical Production-Mixing		Lenawee	46
		DISTRICT	NO.
		Ann Arbor	08

REMARKS:

As an authorized representative of the U.S. EPA, on May 14, 1982, I conducted a site investigation to evaluate Hooker Chemicals and Plastics Corporation in Morenci for compliance of Subtitle C of the Resource Conservation Recovery Act (RCRA).

During the investigation, I completed the form: RCRA Inspection Report. The company has applied for storage only on their Part A application, no treatment or disposal.

During this inspection, I observed one hazardous waste drum storage area on the bank of a river on a concrete pad on the north side of a storage building. I observed the following problems with this drum storage (labeled (2) in the Part A application):

(1) Leaking, corroded metal drums (approximately 1,000 drums in storage).
(2) Uncovered drums.
(3) One drum with an apparent forklift hole near the bottom-drum was empty - except a few inches of liquid below the hole.
(4) On the surface of the concrete in between the rows of drums, ooze and colored waste material had collected. It looked as if these drums had been stored and waste had been leaking for a considerable period of time.
(5) Drums were collapsed and falling into the fence on the bank of the river.
(6) One partially burried drum between the fence and the river at the north end of the storage building.
(7) While walking on the east side of this drum storage area, I observed a strong, irritating odor. I asked Richard Fredrick what the odor was, he said he could not smell anything. I then asked and received permission to inspect the roof to determine if this odor was emanating from a process stack. While on the roof, I could not detect the odor. I asked Mr. Fredrick to follow up on this and determine where it was coming from, and also said I would be back to investigate further.

PROJECT	
01 MAJOR SOURCE	
02 MINOR SOURCE	
03 RESIDENCE	
04 MEETING - CONFERENCE	
05 TRAINING	
07	
08	
09	
10	
00 OTHER (explain)	

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
09		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
00 OTHER (explain)		

COMPLIANCE STATUS	
A. IN COMPLIANCE	
B. UNKNOWN COMPLIANCE	
C. OUT OF COMPLIANCE NOT ON A SCHEDULE	
D. ON A SCHEDULE MEETING INCREMENTS	
E. ON A SCHEDULE, NOT MEETING INCREMENTS	
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS	

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

ESTABLISHMENT: Hooker Chemicals and Plastics Corporation	NO.: B-2422	DATE MM/DD/YY: 05-14-82	
NUMBER AND STREET	CITY	QUARTER: MAY	NO.: 02
CONTACT	TITLE	STAFF: L. Koivuniemi	NO.: 97
PRIMARY ACTIVITY		COUNTY: Lenawee	NO.: 46
Page 2 of 2		DISTRICT: Ann Arbor	NO.: 08

REMARKS:

(8) There was not enough aisle space to allow the unobstructed movement of personnel and spill control equipment in violation of RCRA-265.35.

This hazardous waste storage area had many violations under RCRA of which I will do more investigating, but there also appeared to be Act 245 or water discharge violations. Therefore, I will contact Water Quality Division and Al Howard, Environmental Services Division, Office of Hazardous Waste Management to arrange further investigations and documentation of this hazardous waste storage facility's unacceptable storage area.

PROJECT	
01 MAJOR SOURCE	
02 MINOR SOURCE	
03 RESIDENCE	
04 MEETING - CONFERENCE	
05 TRAINING	
07	
08	
09	
10	
00 OTHER (explain)	

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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18		
19		
00 OTHER (explain)		

COMPLIANCE STATUS	
A. IN COMPLIANCE	
B. UNKNOWN COMPLIANCE	
C. OUT OF COMPLIANCE NOT ON A SCHEDULE	
D. ON A SCHEDULE MEETING INCREMENTS	
E. ON A SCHEDULE, NOT MEETING INCREMENTS	
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS	

R5642

RKER DIVISION / INTER-COMPANY MEMORANDUM Attachment A

rec'd May 27, 198
by Linda Koivu

To:

Date: May 14, 1982

From: J. E. Hutchison

Dept/Loc: Manufacturing-Morenci

Subject: RCRA Inspection

On May 14, 1982, Linda Koivuniemi, representative for the Michigan Department of Natural Resources, Air Quality Division, performed a RCRA inspection of the Morenci facility. Those asked to give their input were Richard Speed, Richard Fredrick, Leland Huffaker, and Joyce Hutchison.

Listed below are the items that were suggested by Ms. Koivuniemi to assist us in our RCRA compliance.

- o Log dates of outgoing manifests and date of returned certificate of disposal and signed manifests.
- o List of waste materials consisting of quality, quantity, and/or volume.
- o Follow up RCRA training with employees, train Jose' Diccion.
- o For our Waste Analysis Plan - keep a record and copies of all tests run on wastes, including Panel Department sludge. The records are to be kept at Morenci. An operating log must be kept as per Section 265.73.
- o Institute a log for inspection of our fence that perimeters our waste material. This inspection should be done once a week, along with inspection of storage area as per Section 265.15.
- o Review RCRA Plan annually.
- o Store waste two drums wide with a suitable aisle to walk thru for inspections.
- o All leaking containers must be transferred immediately to good containers, and all spills promptly and properly cleaned up.
- o Submit Emergency Contingency Plan to local authorities, police chief and fire chief. A letter should accompany plan requesting their signature to confirm that they received such information.

Copies:

- Closure Plan - cost estimate must be updated once a year, by May 19. Be sure to date the cost estimate as per Section 265.75.

- Training of employees should be updated at least once per year and recorded as per Section 265.16.

- The RCRA Interim Status Manual prepared in 1981 by R. G. Speed and L. K. Huffaker, which addressed all of the above items as well as the complete Section 265, texts were most helpful to the inspector. This manual should be updated and reissued.

DEQ

FAX TRANSMITTAL

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION
CONSTITUTION HALL, ATRIUM NORTH
525 WEST ALLEGAN STREET
PO BOX 30241
LANSING MI 48909-7741

Date/Time: 9-18 ~~1100~~ ~~1200~~ 1110 Pages: ~~3~~ ~~4~~ ~~3~~ ~~3~~ 5

To: Brian Freeman

Department:

Company:

Phone: Fax: 312-353-4342

From: Clay Spencer

Unit:

Section:

Phone: 517-373-7968 Fax: 517-373-4797

Note: Brian - Henkel files from AQD

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

ESTABLISHMENT: Hooker Chemicals and Plastics Corp	NO.: B-2422	DATE MM/DD/YY: 06-15-82	
NUMBER AND STREET:	CITY:	QUARTER: JUNE	NO.: 02
CONTACT:	TITLE:	STAFF: L. Koivuniemi	NO.: 97
PRIMARY ACTIVITY:		COUNTY: LENAWEE	NO.: 46
		DISTRICT: ANN ARBOR	NO.: 08

Page 2

REMARKS:

plastic internal liner were laying on their side, one was leaking. The fiberpac outer shell had broken down and only the plastic liner was holding the liquid. The liquid was corrosive; it had dripped on & eaten through some wood under it.

I informed Mr. Fredricks that this "mess" had to be cleaned up right away, since everytime it rained the contaminants washed directly into the river immediately adjacent to these leaking drums.

Mr. Fredricks did not know what was in these two fiberpac barrels containing liquid. He said the company would analyze them to determine proper disposal and clean up the area.

When I got back to the office, I called Roy Schrameck of W.Q.D. #1 to inform him of this newly discovered improper storage area. Roy was in Chicago; therefore, I left him a message to call me when he returned.

Monday June 21, 1982 :

Roy called me back on Monday 06-21-82. Roy had received the results from our 05-18-82 sampling showing extremely high levels of PCB's on the ground near the river.

Therefore, Roy and I decided it was necessary to document what was in this newly discovered unacceptable storage area. Roy called Ron Waybrandt, PCB Coordinator in Lansing and Lyle Rowell of E.E.D. Ron W. told Roy to follow up as planned. Lyle was not in; therefore, Roy Schrameck talked to Warren Hutchinson of E.E.D. who informed Roy that Lyle did not need to be involved in our investigation or meeting with Hooker, on Tues. 6-22-82.

Roy and I arranged to go to Hooker the following day June 22, 1982.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

	SURVEY ACTION	TYPE	NO.
01	EMISSION POINTS INVESTIGATED		
02	VISIBLE EMISSION EVALUATION		
03	SOURCE TEST (STAFF)		
04	SOURCE TEST (COMPANY)		
05	GRAB SAMPLE		
06	PICTURES TAKEN		
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17			
18			
19			
00	OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

A.Q.D. - Lansing File

B 2422

Lenawee Co.

June 14, 1982

TO: Al Howard, OHWM, MDNR
U.S. EPA, Region V, Chicago

FROM: Linda Koivuniemi, A.Q.D.

SUBJECT: Hooker Chemicals and Plastics, Morenci
RCRA AND ACT 64 VIOLATIONS

Attached are:

(1) Three activity reports describing my recent RCRA investigations to Hooker Chemicals and Plastics, Morenci.

(2) A letter from John D. Kashner of Hooker dated June 1, 1982.

(3) RCRA inspection report.

(4) Draft EPA Compliance Order.

Please note in my three attached activity reports that this company has changed its story on more than one occasion:

(1) At the beginning the hazardous waste drums had been accumulating since April, 1981; then later the drums had been in storage prior to RCRA rules going into effect on November 19, 1980.

(2) Also, at the beginning the company would not accept returned product/waste unless the company returning the unused material paid a fee of approximately $120 per drum. Then, after I informed the company they were accepting unmanifested waste, they changed and said they accepted unused product back from the customer for credit.

It is my understanding that the Federal Register/Vol. 45, No. 229/Tuesday, November 25, 1980/Rules and Regulations, does not apply to the Hooker returned material because the returned product/waste is not regulated under 261.33, but hazardous based on its characteristics under Sub part C of 40 CFR 261.

Due to the serious violations caused by leaking and open hazardous waste drums, it is my belief that this company should be fined and issued the attached Compliance Order without further delay.

cc: Joe Boyle, U.S. EPA Region V (no attachments) sent directly to Chicago from the Ann Arbor Air Quality Office.

LKK:vl

DEPARTMENT OF NATURAL R URCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 05-18-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corporation(Formerly Parker Chemical)	B-2422	MAY	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prd'n Sup't.	Lenawee	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing RCRA Inspection #2.		Ann Arbor	08

REMARKS:

Conducted a joint investigation of this company's hazardous waste storage practices with Roy Schrameck, District Engineer, Water Quality District #1. As stated in my previous activity report of 05-14-82, there appeared to be Act 245 (Water Law) violations due to this company's hazardous waste drum storage area, i.e. open or leaking drums. Therefore, Roy and I conducted this follow up inspection.

Roy and I informed the company that I would be collecting more information for my RCRA report (as an authorized representative of the U.S. EPA) and Roy would be inspecting the company for possible Act 245 violations. Since the MDNR's Offices of Hazardous Waste Management (OHWM) does not have field staff; they did not have anyone at this inspection. I had contacted OHWM and informed them of the huge number of leaking drums and, also that Roy and I would follow up with an inspection and sampling. OHWM was in agreement with the need for a more complete inspection to determine the contents of the leaking drums located in the company's hazardous waste storage area.

When I checked the company's inspection log of the drums the company generally had not been noting and correcting the problems of leaking drums, open drums and inadequate aisle space. One problem was cited in April 1982: a barrel of 70% ethylamine (no longer used raw material- not a Hooker product) had been expanding due to warm weather. Mr. Fredrick corrected this problem by "rupturing and venting" to release the pressure in the drum. This was the source of the strong, irritating odor that I had detected during my first or May 14, 1982 site investigation. This waste ethylamine storage drum was not in the same storage area (A) that I had been shown on my first inspection, but in storage area (A) approximately 20 feet west of storage area (A) (diagram attached).

The company informed Roy and I that the drums had been accumulating since April 1981. This is apparently a violation of Act 64, P. A. 1979-long term storage, which requires a permit....

PROJECT
01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07 _____
08 _____
09 _____
10 _____
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
09 _____		
10 _____		
11 _____		
12 _____		
13 _____		
14 _____		
15 _____		
16 _____		
17 _____		
18 _____		
19 _____		
00 OTHER (explain)		

COMPLIANCE STATUS
A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

R5642

DEPARTMENT OF NATURAL R URCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 05-18-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corporation	B-2422	MAY	02
NUMBER AND STREET	CITY	STAFF	NO.
		L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
		Lenawee	46
PRIMARY ACTIVITY		DISTRICT	NO.
Page 2		Ann Arbor	08

REMARKS:

if storing longer than one year.

Mr. Fredrick informed us that the only reason the drums were still on site was because they had problems getting approval from Cecos; therefore, the company switched to Chemical Waste Management in Alabama and was working on a contract and getting a truck in to ship the waste. The shipping date had not been set yet.

Accepting Unmanifested Hazardous Waste:

When asked why the drums were in such bad shape, i.e. leaking and corroded, Mr. Fredrick said many of the drums had arrived that way as returned product or off spec material from companies which Hooker had originally supplied, as well as, it was a bad winter. Most of these companies returning this waste pay Hooker a disposal cost of $120 per drum, occasionally a company may get a credit toward their next purchase from Hooker.

~~When I asked to see the manifests for these off-spec~~ or returned products, the company informed me that the ~~waste was not manifested because Hooker made the~~ decision after the returned drum contents were inspected ~~by Hooker to determine if Hooker could use or recycle~~ the waste. I informed Mr. Fredrick and Richard Speed ~~that the material "being beneficially used or reused or~~ legitimately recycled or reclaimed" 40CFR 261.6, need not ~~be manifested. But at the point Hooker has decided it can not~~ reclaim this material and therefore the waste is to ~~be disposed of, it is a waste, and also, Hooker has~~ accepted an unmanifested hazardous waste if it is ~~hazardous (40 CFR Part 261, Identification of Hazardous~~ Waste).

Roy Schrameck informed Mr. Fredrick and Richard Speed that it appeared Hooker may be required to conduct a MDNR approved hydrogeological survey to determine if Hooker's practices of waste disposal had created ground water contamination. The company did not react negatively to Roy's suggestion for a hydro-survey.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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16		
18		
19		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

R5642

DEPARTMENT OF NATURAL F URCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 05 18 82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corporation	B 2422	MAY	02
NUMBER AND STREET	CITY	STAFF	NO.
		I. Koivunieni	97
CONTACT	TITLE	COUNTY	NO.
		Lenawee	46
PRIMARY ACTIVITY		DISTRICT	NO.
		Ann Arbor	68

Page 3 of 3

REMARKS:

Request for Pictures and Samples:

Roy and I asked the company officials if they had any objections to our taking pictures and samples. Richard Speed asked John D. Cashner, Plant Manager, for permission. Mr. Cashner came in to Mr. Speed's office where we were waiting and said it was all right.

I took twenty-two pictures and Roy took three samples from the ground, (description attached). We saw six different drum storage areas. Apparently, pictures were lost in process since they were not returned to me from Lodge.

Mr. Fredrick insisted that the company was not presently storing ignitible or reactive waste as reported in their Part A application to the U.S. EPA. I observed in storage area (2) at least one drum labeled Industrial Solvents; therefore, I am not convinced that Mr. Fredrick was accurate in this statement. Therefore, since Roy and I did not have the proper equipment to sample drums, I will be returning to Hooker with the proper sampling equipment to verify what is in some of the drums, and compare these samples to what Hooker has in their operating record (as required by 40 CFR 265.73).

Roy and I also looked at an area of 4,000 gallon storage tanks in the basement of the west manufacturing building, used to store corrosive products going out (e.g. nickel nitrate). These tanks may be used to store hazardous waste if needed in the future.

Hooker's Prdt labeling system:

yr.	area	Batch #
9	1	2373

The 9 refers to 1979.

91273-cold cleaner lying on its side next to fence area (2)

Size of storage area (2) (estimated): 29 drums X 3 drums X drums equals approximately 1,300 drums.

Mr. Fredrick said he "had 935 drums stored in back and 150 across the street". Also, in the future the company hoped to have only 80 drums in storage at a time.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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18		
19		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING 15 INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

R6642

had an aerial photo taken showing wastes haphazardly lying around behind the wall of drums showing in this photo. Note pictures of this area (6) taken June 22, 1982, #23-38.

May 27, 1982

#22: 12:24 PM: Took with a flash, F 5.6, 125, the reason the flash was needed was because it had just gotten dark; it started to rain after this photo was taken.

A. Roy Schrameck collecting sample #4 from area (3). We did not get pictures of samples 1,2, or 3. All four samples were split with Hooker.
B. Company said this was likely oil and emulsifier. ESD lab tested and found pH 3, flash point approximately 190°F.

June 22, 1982: It had rained the night before these pictures were taken in area (6):

#23: 12:12 PM : F 5.6, 125

A. Sample #1 collected by Roy Schrameck in area (6), next to the river.
B. Sample #1 collected from surface of ground next to fence. Note dark-stained material forming a pathway to the river; also, hole in fence. Even though it had rained and the barrels and ground were still wet the storage pad and surface of ground were heavily stained with green-yellow, black liquid wastes.

#24: 12:16 PM : F 8, 125

A. Area (6) - west side, collection point for sample #1.
B. This is a wider angle of picture #23, supra. Please note the yellow-green, dark colored material leaching to river.

#25: 12:17 PM : F 8, 125

A. Sample #2-another surface ground sample collected a few feet south of sample #1 in area (6) along river.
B. Note liquid storage drum in foreground; company could not identify the contents. We could not collect a sample of this waste because it would have to be placed in a recovery drum. The fiberpac barrel's outer shell had disintegrated. Company promised to immediately place in recovery drum and sample to determine proper disposal and share the sample with the DNR.

#26: 12:18 PM : F 8, 250
A. Same as #25, supra: Close-up of where Roy collected sample #2, sample #2-visible on sample bottle.
B. Note dark- stained soil.

#27: 12:19 PM : F 5.6, 125
A. Approximately 4 ft. to east of sample collection point #2. Sample #3.
B. Note green-yellow oil-like slick on ground in foreground.

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

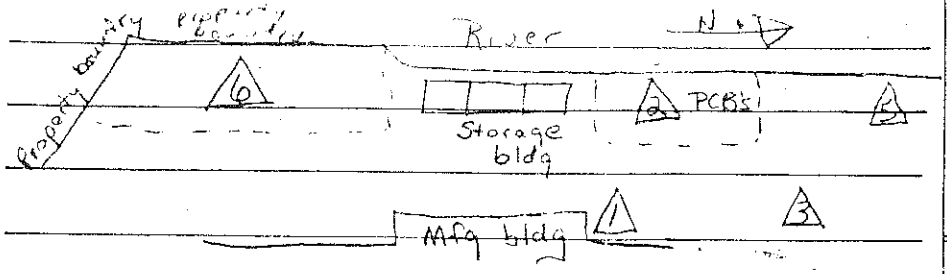
☐ RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

To: Sally Swanson - USEPA Region V Direct

ESTABLISHMENT	NO.	DATE MM/DD/YY
Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	B-2422	06-22-82
NUMBER AND STREET	CITY	QUARTER / NO.
322 W. Main Street	Morenci	JUNE / 02
CONTACT	TITLE	STAFF / NO.
Richard Fredrick	Prod. Sup't.	L. Koivuniemi / 97
PRIMARY ACTIVITY		COUNTY / NO.
Chemical Production-Mixing Pg 1 of 5		LENAWEE / 46
		DISTRICT / NO.
		ANN ARBOR / 08

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area (6) which is south of the storage building next to the river.



There was no easy path to get back to the fence next to the river in storage area (6). First we tried the south end of storage area (6) but drums and lab. samples haphazardly strewn made it impossible to get to the west side of this storage area via this path. Finally, we got through by going along the south side of the storage building and pushing in the fence to get to the west side of storage area (6) which is on a concrete pad.

Mr. Fredricks and Lee Huffaker accompanied Roy and me while we collected 4 samples from the ground-no drums were sampled. The drums which we were most concerned about were two badly decomposed plastic lined fibpac barrels laying on their sides. One of which was leaking on to the ground and had eaten into the wood that the barrel was placed on. The liquid was possibly a chromic acid-like substance, since there was a greenish-yellow material near these two barrels on the ground. Roy sampled this before mentioned material; but, since it had apparently rained heavily the night before the sample was probably more diluted than it would have been if we had collected before the rain. There was evidence of rain because the area was still wet, as it had just rained.

When I had originally seen this contaminated part of area (6) on 6-15-82, there had been a lot more multi-colored liquid on the ground. This likely had been washed away by the recent rain. There was evidence that water washed directly from this storage pad into the river, because there were obvious drainage areas. Some of which were stained dark-not unlike an oil slick.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07 _____
08 _____
09 _____
10 _____
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
09 _____		
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17 _____		
18 _____		
19 _____		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

B5642
3/77

Staff Report

Occidental Chemical Corporation
Parker Surface Treatment Products Division
322 Main Street
Morenci, Michigan

Linda Koivuniemi, DNR Air Quality Division, conducted a RCRA inspection at Occidental Chemical in Morenci on May 14, 1982. There were numerous violations of the RCRA regulations surfaced as a result of that in inspection. Linda noted that the storage area was generally in poor condition with what appeared to be chemical residues on-the ground surface, leaky drums and indications of overland runoff from the storage area to Bean Creek on the west property line of the company. As as result of these observations, Linda contacted the District I Water Quality Division office on May 17, 1982 and dicussed the potential groundwater and surface water problems associated with the site with the writer. We agreed to meet at Occidental Chemical on May 18, 1982 so that I could evaluate the situation with regard to potential groundwater and/or surface water contamination and possible violations of Act 245, P.A. 1929, as amended.

May 18, 1982

I met with Linda and she furnished me with a copy of the company's Part A RCRA application and reviewed her observations of May 14, 1982. Linda and I then went to Occidental Chemical and met with Mssrs. Richard Fredrick and Richard Speed and advised them that Linda was doing a follow-up/continuation regarding the RCRA inspection and that I would be inspecting the site relative to possible Act 245 violations. We requested, and received, permission to inspect the drum storage areas, take pictures and possibly collect some samples off the ground in the storage areas. Permission was granted verbally by Mr. John Kashner, Manager-Manufacturing, Occidental Chemical.

All the drum storage areas were undiked and four of the six areas were on stone or unprotected earth. With reference to the attached site drawing (attachment I), the storage areas are described below:

1 - Located at the northwest corner of the manufacturing building on a crushed stone base. This area contained an estimated 200 drums ± 5%. Approximately 10% of the drums were damaged but there were only minimal indications of any leakage onto the ground. At least one drum had the outer metal completely rusted out and the remaining "drum" was empty.

2 - This area is located just north of the new drum storage building on a concrete pad. The pad was covered with "dirt" and leaves. There were approximately 1536 drums ± 5%, of which about 25% appeared to be damaged and/or leaking. Several drums had chemicals on the outside indicating leaks from the drums. There was "oilly" residue soaked into the leaves and dirt on the pad

Arter we collected the drum samples we met with Mssrs. Kashner, Fredrick and Huffaker to discuss additional RCRA information that Linda needed. During our disucussion, Lee Huffaker indicated that he felt some of the stored material would not have needed to be manifested under RCRA because it had been returned prior to November 19, 1980 when RCRA regulations took affect.

June 22, 1982

Linda and I met with Dick Fredrick, Lee Huffaker and John Kashner to discuss the PCB results obtained in our May 18, 1982 samples, collect additional RCRA information and inspect the storage area that Linda discovered during her June 15, 1982 inspection.

Linda once again requested a copy of Occidental's operating record under RCRA. The company indicated they were still working on putting the information together. The record would not be done until all materials were shipped out to Chemical Waste Management. Linda then requested copies of all the waste characterisation Reports being compiled for Chemical Waste Management. The company responded by stating that about 80 drums had not been characterised yet because they could not get any markings off the drums but that samples from these drums had been shipped to the company's lab for analysis the previous week.

The company stated that the new storage area Linda had discovered behind the empty stainless steel drums in area 6, contained sample bottles from lab samples that someone had deposited in the area contrary to established procedures and two drums of liquid that no one knew anything about. The remaining drums contained "bag house" dust from the air scrubbers at the plant.

Linda and I inspected the expanded number 6 storage area. Several attempts were made to penetrate through to the waste area in question without success. We finally gained access by going along the south side of the new storage building and pushing the west property line fence back and squeezing between the fence and the drums to gain access to the west portion of area 6.

The area was generally a mess with deteriorated fibre paks of "bag house" dust having lost their contents all over the concrete pad. There were several open top drums of plastic bottles that Mssrs. Fredrick and Huffaker said were discarded lab sample bottles. When we entered the area, I could hear a hissing sound from one of the barrels. Two fibre pak type barrels with plastic liners had fallen over and the outside shell was deteriorated. Leakage from one of the fibre pak barrels had eaten through the wooden pallet it was resting on and had partially dissolved the cement at the edge of the pallet. There were definite dark colored stains leading from the storage area, under the fence and toward Bean Creek. At least two open top barrels contained rusted, disintegrated aerosol cans once containing material similar to WD-40.

cussion, the company personnel reluctently agreed that someone could have returned a drum to them that contained other than their product and that in reality they had no way of knowing what was in all the drums in the storage area.

I told the company that we wanted them to do a study of the sediments and water in Bean Creek above and below their facility for organics, phosphates and metals and a hydrogeological study to determine groundwater quality and flow direction. The study plan was to be internally discussed with Occidental's corporate environmental personnel during a planned July 12-13, 1982 environmental audit with a letter being sent to us by July 23, 1982 committing to the study and giving us a date for a plan submittal. The south storage area (#6) that we had sampled was to be completely cleaned up by July 16, 1982.

Mr. Richard Speed from Occidental subsequently contacted the writer by telephone on June 24, 1982 and advised me that the environmental audit had been delayed until July 19-20, 1982. We agreed therefore, to meet with personnel from the Morenci facility and Occidental corporate staff on July 9, 1982 to discuss the requested studies. This agreement and our study requirements were confirmed by letter of June 29, 1982 from the District I office.

July 9, 1982

Linda Koivuniemi and I met with the following personnel from Occidental Chemical Corporation on this date:

John Kashner, Plant Manager, Morenci
Richard Speed, Environmental Engineer, Morenci
Mike McLain, Project Engineer, Morenci
Robert Schuttler, Director, Environmental Health and Safety, Niagra Falls, N.Y.

Neither Lee Huffaker, Chemist, or Richard Fredrick, Production Superintendent, for Morenci were in attendance at this meeting.

Several items were discussed during our meeting. A summary of each major item follows:

PCB Sources - We verified with the company where we collected our May 18, 1982 samples.

The company is still unaware of any possible PCB sources on the site. Mr. Schuttler indicated that Occidental had collected a composite core of about the first six inches of soil depth in roughly the same area we collected our surface sample and found no detectable PCB. I stated that I did not see how this negated our data at all since their sample was from a different location and a vertical soil composite,

whereas our sample was scrappings of the organic layer on top of the concrete pad.

Site Clean up - The number six storage area clean up was completed by June 28, 1982. All on-site waste drums from all storage areas have now been either moved to inside storage or shipped off-site to Chemical Waste Management. The company has manifested 1300 drums for disposal. Of these, the company stated 400 to 500 drums were waste and the rest were bag house dust.

Company officials now indicate that the drum storage existed for about 18 months, placing the start of accumulation around January 1981. This is the third variation of an accumulation start date that the company has indicated.

The company agreed that a secure method of determining if a returned drum had been opened was necessary. They are working on devising a drum seal method for future shipments.

Bulk loading facility - The only materials that were bulk loaded into tank trucks were Bonderites. These materials would have contained metallic phosphate compounds. The hose drainage and wash out water from the bulk loading operation is the material discharged into the ground through the previously described stainless steel drum at the loading facility.

On-site organics would have been contained in various solvents and Bonderlub compoundings.

Hydrogeological and Bean Creek Studies - Although Mr. Kashner has implied all along that the Morenci plant supported our request for a groundwater study, Mr. Schuttler indicated that he did not feel that such a study was absolutely necessary. We showed him the pictures taken of the site and explained our concern relative to the leaky drums and the bulk loading facilities. Mr. Schuttler indicated he would reevaluate the need for a hydrogeological study and respond to us by August 4, 1982 as to the company position regarding this study.

Mr. Schuttler was concerned about the validity of sediment samples and interpretation of any resulting data from the requested Bean Creek study. He indicated that Occidental had been involved in similar requests at other facilities and the merit of the study was always questionable when it was completed. I volunteered that our Biology Section had been involved in numerous creek sediment studies and never seemed to have a problem collecting the samples or interpreting the resultant data. Finally, I volunteered that we would do the creek study and the company could do the groundwater study.

Copper (mg/kg) - 1,800
Nickel (mg/kg) - 1,600
Lead (mg/kg) - 23
Zinc (mg/kg) 36

Note: k means less than
NA means "analytical method has not yet been approved by laboratory"

July 27, 1982

Jack Wuycheck and Dennis Swanson from the Biology Section met the writer in Morenci to do a stream study in Bean Creek. Sediment and water samples were collected upstream and downstream of Occidental Chemical. A report pertaining to this study is being complied by Jack Wuycheck.

While we were doing the study we noted two discharges from Occidental to the river and two sewage discharges from the Morenci system were noted. The north (upstream) discharge from Occidental changed colors several times while we observed it and collected samples. Color variations were grey, white, brownish and purple at various times.

After we collected our stream samples, we proceeded to Occidental Chemical and contacted Mssrs. Kashner and Fredrick about the discharge. We described the location where the pipe was entering the river and neither Mr. Kashner or Mr. Fredrick had any idea what the source could be. They were invited to go out and look at the discharge and we left the office and proceeded toward the creek. On the way, Mr. Fredrick disappeared to get a key for the gate that they forgot had to be opened. He joined us shortly afterward with a maintenance man with a drawing of part of the sewer system serving Occidental (see attachmentII). Although the drawing is no longer accurate relative to buildings shown and it is not to scale, it did show that the sewer system could by-pass to the Creek. We located IMH #106, opened the cover and discovered that the system was overflowing. The company then contacted Morenci DPW to have someone come out and stop the by-pass.

While we were waiting we pulled the adjoining cover and found the "regulator" chamber. The sewer system serving Occidental is part of the Village system, which is a combined sewer system. This particular "regulator" consisted of a slide-gate at the outfall end of the chamber with a two section low head dam/backwater gate arrangement on the west side of the chamber. We found a long metal pipe on the company property and tried to push the backwater gates shut but they would not stay closed. I noted that water was flowing through the slide-gate opening along only about 25% of the base. I stuck the pipe down along the gate base to see if it was blocked and dislodged a considerable amount of greyish colored sludge from in front of the gate. The flow immediately filled the whole gate base and the by-pass to the Creek stopped. Sludge similar in physical characteristics to that found in the gate chamber had also been noted previously at the outfall to Bean Creek.

PRC Environmental Management, Inc
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

HST-005

RCRA TREATMENT, STORAGE, AND DISPOSAL FACILITIES CORRECTIVE ACTION PRIORITIZATION

FINAL REPORT

ATTACHMENT 1

CUMULATIVE SCORING SUMMARY FOR 1,696 FACILITES

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, D.C. 20460

Work Assignment No.	:	R05001
EPA Region	:	5
Site No.	:	Various
Date Prepared	:	September 30, 1994
Contract No.	:	68-W4-0007
PRC No.	:	070-R0500101PR
Prepared by	:	PRC Environmental Management, Inc.
Contractor Project Manager	:	Shin H. Ahn
Telephone No.	:	312/856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	312/886-4448

HST-004

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

ESTABLISHMENT - (Formerly Parker Chemical)		DATE MM/DD/YY: 05-14-82	
Hooker Chemicals and Plastics Corporation	B-2422	QUARTER: MAY	NO.: 02
NUMBER AND STREET: 322 W. Main Street	CITY: Morenci	STAFF: L. Koivuniemi	NO.: 97
CONTACT: Richard Fredrick	TITLE: Prod. Sup't.	COUNTY: Lenawee	NO.: 46
PRIMARY ACTIVITY: Chemical Production-Mixing		DISTRICT: Ann Arbor	NO.: 08

REMARKS:

As an authorized representative of the U.S. EPA, on May 14, 1982, I conducted a site investigation to evaluate Hooker Chemicals and Plastics Corporation in Morenci for compliance of Subtitle C of the Resource Conservation Recovery Act (RCRA).

During the investigation, I completed the form: RCRA Inspection Report. The company has applied for storage only on their Part A application, no treatment or disposal.

During this inspection, I observed one hazardous waste drum storage area on the bank of a river on a concrete pad on the north side of a storage building. I observed the following problems with this drum storage (labeled ② in the Part A application):

(1) Leaking, corroded metal drums (approximately 1,000 drums in storage).
(2) Uncovered drums.
(3) One drum with an apparent forklift hole near the bottom-drum was empty - except a few inches of liquid below the hole.
(4) On the surface of the concrete in between the rows of drums, ooze and colored waste material had collected. It looked as if these drums had been stored and waste had been leaking for a considerable period of time.
(5) Drums were collapsed and falling into the fence on the bank of the river.
(6) One partially burried drum between the fence and the river at the north end of the storage building.
(7) While walking on the east side of this drum storage area, I observed a strong, irritating odor. I asked Richard Fredrick what the odor was; he said he could not smell anything. I then asked and received permission to inspect the roof to determine if this odor was emanating from a process stack. While on the roof, I could not detect the odor. I asked Mr. Fredrick to follow up on this and determine where it was coming from, and also said I would be back to investigate further.

PROJECT	
01	MAJOR SOURCE
02	MINOR SOURCE
03	RESIDENCE
04	MEETING - CONFERENCE
05	TRAINING
07	
08	
09	
10	
00	OTHER (explain)

	SURVEY ACTION	TYPE	NO.
01	EMISSION POINTS INVESTIGATED		
02	VISIBLE EMISSION EVALUATION		
03	SOURCE TEST (STAFF)		
04	SOURCE TEST (COMPANY)		
05	GRAB SAMPLE		
06	PICTURES TAKEN		
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19			
00	OTHER (explain)		

COMPLIANCE STATUS	
A.	IN COMPLIANCE
B.	UNKNOWN COMPLIANCE
C.	OUT OF COMPLIANCE NOT ON A SCHEDULE
D.	ON A SCHEDULE MEETING INCREMENTS
E.	ON A SCHEDULE, NOT MEETING INCREMENTS
F.	ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

R5642

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED
☐ PERMIT ACTION
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED
☐ NESHAP
☐ NSPS
☐ REVISED STATUS

ESTABLISHMENT: Hooker Chemicals and Plastics Corporation	NO.: B-2422	DATE MM/DD/YY: 05-14-82	
NUMBER AND STREET	CITY	QUARTER: MAY	NO.: 02
CONTACT	TITLE	STAFF: L. Koivuniemi	NO.: 97
PRIMARY ACTIVITY		COUNTY: Lenawee	NO.: 46
Page 2 of 2		DISTRICT: Ann Arbor	NO.: 08

REMARKS:

(8) There was not enough aisle space to allow the unobstructed movement of personnel and spill control equipment in violation of RCRA-265.35.

This hazardous waste storage area had many violations under RCRA of which I will do more investigating, but there also appeared to be Act 245 or water discharge violations. Therefore, I will contact Water Quality Division and Al Howard, Environmental Services Division, Office of Hazardous Waste Management to arrange further investigations and documentation of this hazardous waste storage facility's unacceptable storage area.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING - CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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18		
19		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

HST-004

RKER DIVISION / INTER-COMPANY MEMORANDUM Attachment A

rec'd May 27, 198.
by Linda Koivu

To:

Date: May 14, 1982

From: J. E. Hutchison

Dept/Loc: Manufacturing-Morenci

Subject: RCRA Inspection

On May 14, 1982, Linda Koivuniemi, representative for the Michigan Department of Natural Resources, Air Quality Division, performed a RCRA inspection of the Morenci facility. Those asked to give their input were Richard Speed, Richard Fredrick, Leland Huffaker, and Joyce Hutchison.

Listed below are the items that were suggested by Ms. Koivuniemi to assist us in our RCRA compliance.

- Log dates of outgoing manifests and date of returned certificate of disposal and signed manifests.
- List of waste materials consisting of quality, quantity, and/or volume.
- Follow up RCRA training with employees, train Jose' Diccion.
- For our Waste Analysis Plan - keep a record and copies of all tests run on wastes, including Panel Department sludge. The records are to be kept at Morenci. An operating log must be kept as per Section 265.73.
- Institute a log for inspection of our fence that perimeters our waste material. This inspection should be done once a week, along with inspection of storage area as per Section 265.15.
- Review RCRA Plan annually.
- Store waste two drums wide with a suitable aisle to walk thru for inspections.
- All leaking containers must be transferred immediately to good containers, and all spills promptly and properly cleaned up.
- Submit Emergency Contingency Plan to local authorities, police chief and fire chief. A letter should accompany plan requesting their signature to confirm that they received such information.

Copies:

- Closure Plan - cost estimate must be updated once a year, by May 19. Be sure to date the cost estimate as per Section 265.75.

- Training of employees should be updated at least once per year and recorded as per Section 265.16.

- The RCRA Interim Status Manual prepared in 1981 by R. G. Speed and L. K. Huffaker, which addressed all of the above items as well as the complete Section 265, texts were most helpful to the inspector. This manual should be updated and reissued.

FAX TRANSMITTAL

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION
CONSTITUTION HALL, ATRIUM NORTH
525 WEST ALLEGAN STREET
PO BOX 30241
LANSING MI 48909-7741

Date/Time: 9-18 1110 Pages: 5

To: Brian Freeman

Department:

Company:

Phone: Fax: 312-353-4342

From: Clay Spencer

Unit:

Section:

Phone: 517-373-7968 Fax: 517-373-4797

Note: Brian - Herbel files from AQD

PRC PA/VSI Report - Henkel - 1994.
for CA Ranking on Priority List.

HENKEL CORPORATION, PARKER AND AMCHEN (MID 058 723 867)

Parker Acid / Visual Site Inspection

Henkel Corporation, Parker and Amchen, formerly Parker Surface Treatment Products, produces metal-treating chemicals. The facility is located in Morenci, Michigan, and has been in operation since 1928. Extensive site contamination has been documented, probably as the result of improperly stored drums. These drums were removed in 1982. The facility is presently permitted to store 15,000 gallons in containers (S01) of D001, D002, D003, and D007 listed wastes. Henkel has submitted a closure plan for their container storage area.

The groundwater route was scored based on limited data indicating the presence of heavy metals such as lead, zinc, and cyanide in the aquifer of concern. The metals were contained in improperly stored, leaking drums. The groundwater is the drinking water source and wells are located 50 yards from the site.

Henkel does not maintain an NPDES permit. Heavy metals and PCBs were detected in Bean Creek, which runs along the site boundary. The contamination detected in the creek was probably the result of reported leaking barrels. The use of Bean Creek for recreation is assumed. The distance to a sensitive environment is greater than 2 miles from the site.

No observed release was scored for the air route. The facility does have an air operating permit. However, no permit violations have been documented. Drums located outdoors did not have covers and because baghouse dust fiber packs were strewn across the property. Several organics are stored in these drums. Residences are located within 1/4 mile of the facility.

On-site contamination from PCB and heavy metals was observed. The access to this site is unrestricted.

References:

Parker Chemical Co. 1988. Revised Closure Plan. May 12.

MDNR. 1985. CERCLA PA of Parker Surface Treatment Products, Morenci, Michigan.

EPA. 1990. RCRA Part A Permit and Compliance Files.

PRC. 1994. "NCAPS Information Request - Michigan." Received by Facsimile from MDNR on February 14.

HST-001

FAX TRANSMITTAL

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WASTE AND HAZARDOUS MATERIALS DIVISION
CONSTITUTION HALL, ATRIUM NORTH
525 WEST ALLEGAN STREET
PO BOX 30241
LANSING MI 48909-7741

Date/Time: 9-18 ~~1:50~~ 1:00 Pages: ~~3~~ 13

To: Brian Freeman

Department:

Company:

Phone: Fax: 312-353-4342

From: Clay Spencer

Unit:

Section:

Phone: 517-373-7968 Fax: 517-373-4797

Note: Brian - Henkel files from AQD

ANDRE - READ
YELLOW SHADED AREA CLOSER

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

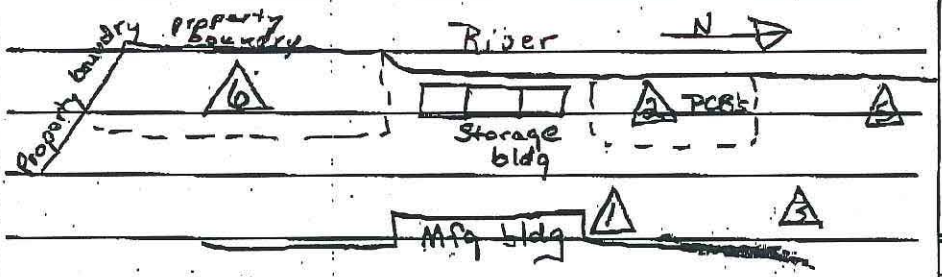
☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 06-22-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	B-2422	JUNE	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing Pg 1 of 5		ANN ARBOR	08

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area 6 which is south of the storage building next to the river.



There was no easy path to get back to the fence next to the river in storage area 6. First we tried the south end of storage area 6 but drums and lab. samples haphazardly strewn made it impossible to get to the west side of this storage area via this path. Finally, we got through by going along the south side of the storage building and pushing in the fence to get to the west side of storage area 6 which is on a concrete pad.

Mr. Fredricks and Lee Huffaker accompanied Roy and me while we collected 4 samples from the ground-no drums were sampled. The drums which we were most concerned about were two badly decomposed plastic lined fibpac barrels laying on their sides. One of which was leaking on to the ground and had eaten into the wood that the barrel was placed on. The liquid was possibly a chromic acid-like substance, since there was a greenish-yellow material near these two barrels on the ground. Roy sampled this before mentioned material; but, since it had apparently rained heavily the night before the sample was probably more diluted than it would have been if we had collected before the rain. There was evidence of rain because the area was still wet, as it had just rained.

When I had originally seen this contaminated part of area 6 on 6-15-82, there had been a lot more multi-colored liquid on the ground. This likely had been washed away by the recent rain. There was evidence that water washed directly from this storage pad into the river, because there were obvious drainage areas. Some of which were stained dark-not unlike an oil slick.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
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10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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19		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE NOT KNOWN IF MEETING INCREMENTS

DEPARTMENT OF NATURAL F OURCES
AIR QUALITY DIVIS.ON

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

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322 W. Main Street	Morenci	L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing		ANN ARBOR	08

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area Δ6. (Continuation Page 2)

These areas of dark colored grass and soil may have been stained by the company's Parco T-8 which had been contained in small aerosol cans (approximately 16 oz. size). Several piles of these aerosol cans were strewn on the ground and most were corroded and empty. Parco T-8 is an oil base lubricant similar to WD40.

Many piles of the baghouse dust were exposed to the weather and was being washed away each time it rained.

The 70% ethylamine drum which was incorrectly stored open outside during earlier inspections had been moved into the storage building, but was still stored open and was almost empty. Disposal had been illegally accomplished by allowing this material to evaporate directly to the atmosphere.

I took pictures of Roy sampling and of the storage area Δ6.

PCB's :

Two samples of surface/contaminant collected 5-18-82 in storage area Δ2 had high levels of PCB's and chromium, sample #3 from area Δ3 was not as high:

	A-1242 PCB ug/kg (ppb)	CR-Total mg/kg (ppm)
Sample #1area 2	19,000	4,700
Sample #2area 2	2,500,000	2,500
Sample #3area 3	6,500	37

Clean-up and Company Sampling:

After we collected our 4 samples and took pictures of storage area Δ6, we had a meeting with John Gashner, Plant

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
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DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

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Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing		ANN ARBOR	08

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area (6). (Continuation Page 3)

Manager, Mr. Richard Fredricks; and Lee Huffaker, Chemist. We requested and obtained as much of their operating record as was available, i.e.:

(1) 24 Manifests of Waste shipped since May 1982

(2) 29 Generator's Waste Material Profile Sheets

(3) Logs of : Chemical waste to ship, transfer record, and chemical waste already shipped.

Much of the waste stored on the west side of area (6) ~~near the river was not labeled and the company could~~ not specifically identify it. The company promised to ~~start immediately to contain all leaking waste~~ and test it to determine proper handling and disposal. ~~The company's operating record is much more deficient~~ then I had originally determined.

Slowly, more and more information is dragged out of the ~~company concerning quality, quantity and location of~~ hazardous waste stored. The company has been less than accurate ~~in answering my questions concerning their hazardous~~ waste activity and practices.

After we had copies of their operating record (required by Appendix I), I asked the company if they had PCB's on the property either in use or storage. They said no-absolutely not-not even in any transformers because the transformers had been tested. (RCRA)

Then Roy S. gave them a copy of the testing results of the ~~3 samples we collected 5-18-82. The three officials could~~ explain the chromium levels because the company used chromium; but the ~~2.5% PCB-A 1242 was not readily~~ explained. We informed the company that they had to ~~determine the extent of the contamination and the source~~ of the PCB's, as well as clean up the contaminated environment, i.e. soils, river sediment and ground

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
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09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
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02 VISIBLE EMISSION EVALUATION		
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COMPLIANCE STATUS

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B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

ESTABLISHMENT: Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	NO. B-2422	DATE MM/DD/YY: 06-22-82	
NUMBER AND STREET: 322 W. Main Street	CITY: Morenci	QUARTER: JUNE	NO. 02
CONTACT: Richard Fredrick	TITLE: Prod. Sup't.	STAFF: L. Koivuniemi	NO. 07
PRIMARY ACTIVITY: Chemical Production-Mixing		COUNTY: LENAWEE	NO. 46
		DISTRICT: ANN ARBOR	NO. 08

Page 4

REMARKS:

water if necessary.
The company agreed to have this area (A) cleaned up and leaking or leaching waste in recovery drums by July 6, 1982 and to have a study plan by approximately July 12 or 13 when the parent company's environmental audit is conducted at the Morenci facility.

Source of PCB's ?:

The company informed us that they use only internally generated waste oil for dust control; therefore, a waste oil for dust control from an outside source was not responsible for this PCB contamination.

The company had transferred and stored Reacto-bond (an oily product) in area (A); therefore, they will be checking to see if this product is contaminated with PCB's through an inadvertent side reaction.

I called Dave Long (6-24-82), ESD Lab; he said that there was practically no chance there was a lab error, Also, since total oil (FE-Oil) was 54,000 mg/kg or ppm or 5.4% that the oil in the sample #2 was approximately 46% PCB.

I also asked Dave to make sure chain of custody was maintained and to save these three samples indefinitely or until notice from Roy-since they were Roy's samples and may be important to either a civil or criminal enforcement case.

Company promised to save samples of liquid in the two badly decomposed plastic lined fiberpac drums, as well as their baghouse dust for me to pick up. The company thought the liquid in these two barrels was CWM #66701. I tried to decode this by looking up Code 66701 on the Generator's Waste Management Material Profile Sheet, but the company had not given me this document. I have 66700 and 66702, but not 66701.

U.S. EPA Phone call of June 23, 1982:

Received telephone call from Ms. Sally Svanson of.....

PROJECT
01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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00 OTHER (explain)		

COMPLIANCE STATUS
A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
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F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

R6642

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 06-22-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	B-2422	JUNE	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivumiemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production Mixing	Pg 5 of 5	ANN ARBOR	08

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area 6 . (Continuation Page 5)

U.S. EPA Region V, Chicago, Telephone (312) 886-7482. She is assigned to write and coordinate the enforcement or compliance order with the company. I promised to get the information I obtained since June 14, 1982 off to her within the next week.

Telephone Call to Lyle Rowell of Environmental Enforcement Division on June 23, 1982:

I called Lyle to make sure he knew about: all of my inspections at Hooker and the high levels of PCB's in the samples collected in area A . Lyle confirmed that there was no need for him to be involved in the sampling or meeting with Hooker on June 22, 1982. Since the company is cleaning up the barrels and agreeing to do a hydrogeological study and perform the subsequent environmental clean up as necessary, it appears a criminal court case may not be pursued. I will continue to inform Lyle of important findings which he may need.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
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10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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00 OTHER (explain)		

COMPLIANCE STATUS

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B. UNKNOWN COMPLIANCE
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DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

- ☐ COMPLAINT RECEIVED
- ☐ PERMIT ACTION
- ☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED
- ☐ NESHAP
- ☐ NSPS
- ☐ REVISED STATUS

DATE - MM/DD/YY: 06-15-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corporation(formerly Parker Chemical)	B-2422	JUNE	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing		ANN ARBOR	08

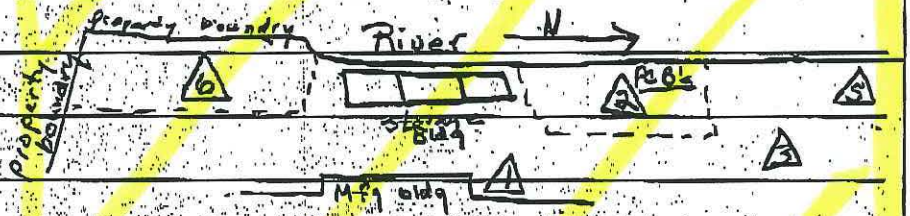
REMARKS:

Dhruman Shah, Permit Engineer and I met with Richard Speed at the company to discuss the Permit to Install applications numbered 243-82, 244-82, and 245-82. Dhruman needed more process information and wanted to look at existing equipment. The company is sending Dhruman a letter with the additional requested information.

Could not conduct a scheduled investigation since the processes were not operating at the time of the meeting, afternoon of 6-15-82.

RCRA (Resource Conservation Recovery Act-Haz. Waste):

I had received a telephone call (06-08-82) and an aerial photo (June 9, 1982) from Lyle Rowell of Environmental Enforcement Division (E.E.D.) informing me that there were some more drums that neither Lyle nor I had previously known about. Therefore, I asked Mr. Fredricks about storage area 6 which is located on the river on the south side of the storage building.



Mr. Fredricks insisted that there was not any hazardous waste stored there only nonhazardous baghouse dust (phosphates) and empty drums.

I insisted that I needed to take a look. Mr. Fredricks continued to want to know why I thought there was anything back there that may be a problem. Finally, I told him that I had seen an aerial photo that had been taken recently and wanted to check out the area. Then Mr. Fredricks said it was all right and I climbed (squeezed) through several rows of drums to discover a mess. There were approximately 100 drums of which many were corroded, leaking or open. Several drums were open and filled with laboratory bottles filled with samples. Two fiberpac barrels with a....

PROJECT

01	MAJOR SOURCE
02	MINOR SOURCE
03	RESIDENCE
04	MEETING – CONFERENCE
05	TRAINING
07	
08	
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00	OTHER (explain)

	SURVEY ACTION	TYPE	NO.
01	EMISSION POINTS INVESTIGATED		
02	VISIBLE EMISSION EVALUATION		
03	SOURCE TEST (STAFF)		
04	SOURCE TEST (COMPANY)		
05	GRAB SAMPLE		
06	PICTURES TAKEN		
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18			
19			
00	OTHER (explain)		

COMPLIANCE STATUS

- A. IN COMPLIANCE
- B. UNKNOWN COMPLIANCE
- C. OUT OF COMPLIANCE NOT ON A SCHEDULE
- D. ON A SCHEDULE MEETING INCREMENTS
- E. ON A SCHEDULE, NOT MEETING INCREMENTS
- F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

DEPARTMENT OF NATURAL R OURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

ESTABLISHMENT: Hooker Chemicals and Plastics Corp	NO.: B-2422	DATE MM/DD/YY: 06-15-82	
NUMBER AND STREET	CITY	QUARTER: JUNE	NO.: 02
CONTACT	TITLE	STAFF: L. Koivuniemi	NO.: 97
PRIMARY ACTIVITY: Page 2		COUNTY: LENAWEE	NO.: 46
		DISTRICT: ANN ARBOR	NO.: 08

REMARKS:

plastic internal liner were laying on their side, one was leaking. The fiberpac outer shell had broken down and only the plastic liner was holding the liquid. The liquid was corrosive; it had dripped on & eaten through some wood under it.

I informed Mr. Fredricks that this "mess" had to be cleaned up right away, since everytime it rained the contaminants washed directly into the river immediately adjacent to these leaking drums.

Mr. Fredricks did not know what was in these two fiberpac barrels containing liquid. He said the company would analyze them to determine proper disposal and clean up the area.

When I got back to the office, I called Roy Schrameck of W.Q.D. #1 to inform him of this newly discovered improper storage area. Roy was in Chicago; therefore, I left him a message to call me when he returned.

Monday June 21, 1982 :

Roy called me back on Monday 06-21-82. Roy had received the results from our 05-18-82 sampling showing extremely high levels of PCB's on the ground near the river.

Therefore, Roy and I decided it was necessary to document what was in this newly discovered unacceptable storage area. Roy called Ron Waybrandt, PCB Coordinator in Lansing and Lyle Rowell of E.E.D. Ron W. told Roy to follow up as planned. Lyle was not in; therefore, Roy Schrameck talked to Warren Hutchinson of E.E.D. who informed Roy that Lyle did not need to be involved in our investigation or meeting with Hooker, on Tues. 6-22-82.

Roy and I arranged to go to Hooker the following day June 22, 1982.

PROJECT

01	MAJOR SOURCE
02	MINOR SOURCE
03	RESIDENCE
04	MEETING – CONFERENCE
05	TRAINING
07	
08	
09	
10	
00	OTHER (explain)

	SURVEY ACTION	TYPE	NO.
01	EMISSION POINTS INVESTIGATED		
02	VISIBLE EMISSION EVALUATION		
03	SOURCE TEST (STAFF)		
04	SOURCE TEST (COMPANY)		
05	GRAB SAMPLE		
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00	OTHER (explain)		

COMPLIANCE STATUS

A.	IN COMPLIANCE
B.	UNKNOWN COMPLIANCE
C.	OUT OF COMPLIANCE NOT ON A SCHEDULE
D.	ON A SCHEDULE MEETING INCREMENTS
E.	ON A SCHEDULE, NOT MEETING INCREMENTS
F.	ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

EQP5642

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

A.Q.D. - Lansing File
B 2422
Lenawee Co.

June 14, 1982

TO: Al Howard, OHWM, MDNR
U.S. EPA, Region V, Chicago

FROM: Linda Koivuniemi, A.Q.D.

SUBJECT: Hooker Chemicals and Plastics, Morenci
RCRA AND ACT 64 VIOLATIONS

Attached are:

(1) Three activity reports describing my recent RCRA investigations to Hooker Chemicals and Plastics, Morenci.

(2) A letter from John D. Kashner of Hooker dated June 1, 1982.

(3) RCRA inspection report.

(4) Draft EPA Compliance Order.

Please note in my three attached activity reports that this company has changed its story on more than one occasion:

(1) At the beginning the hazardous waste drums had been accumulating since April, 1981; then later the drums had been in storage prior to RCRA rules going into effect on November 19, 1980.

(2) Also, at the beginning the company would not accept returned product/waste unless the company returning the unused material paid a fee of approximately $120 per drum. Then, after I informed the company they were accepting unmanifested waste, they changed and said they accepted unused product back from the customer for credit.

It is my understanding that the Federal Register/Vol. 45, No. 229/Tuesday, November 25, 1980/Rules and Regulations, does not apply to the Hooker returned material because the returned product/waste is not regulated under 261.33, but hazardous based on its characteristics under Sub part C of 40 CFR 261.

Due to the serious violations caused by leaking and open hazardous waste drums, it is my belief that this company should be fined and issued the attached Compliance Order without further delay.

cc: Joe Boyle, U.S. EPA Region V (no attachments) sent directly to Chicago from the Ann Arbor Air Quality Office.

LKK:yl

DEPARTMENT OF NATURAL R URCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 05-18-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corporation(Formerly Parker Chemical)	B-2422	MAY	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prd'n Sup't.	Lenawee	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing RCRA Inspection #2.		Ann Arbor	08

REMARKS:

Conducted a joint investigation of this company's hazardous waste storage practices with Roy Schrameck, District Engineer, Water Quality District #1. As stated in my previous activity report of 05-14-82, there appeared to be Act 245 (Water Law) violations due to this company's hazardous waste drum storage area, i.e. open or leaking drums. Therefore, Roy and I conducted this follow up inspection.

Roy and I informed the company that I would be collecting more information for my RCRA report (as an authorized representative of the U.S. EPA) and Roy would be inspecting the company for possible Act 245 violations. Since the MDNR's Office of Hazardous Waste Management (OHWM) does not have field staff; they did not have anyone at this inspection. I had contacted OHWM and informed them of the huge number of leaking drums and, also that Roy and I would follow up with an inspection and sampling. OHWM was in agreement with the need for a more complete inspection to determine the contents of the leaking drums located in the company's hazardous waste storage area.

When I checked the company's inspection log of the drums the company generally had not been noting and correcting the problems of leaking drums, open drums and inadequate aisle space. One problem was cited in April 1982: a barrel of 70% ethylamine (no longer used raw material- not a Hooker product) had been expanding due to warm weather. Mr. Fredrick corrected this problem by "rupturing and venting" to release the pressure in the drum. This was the source of the strong, irritating odor that I had detected during my first or May 14, 1982 site investigation. This waste ethylamine storage drum was not in the same storage area (A) that I had been shown on my first inspection, but in storage area (A) approximately 20 feet west of storage area (A) (diagram attached).

The company informed Roy and I that the drums had been accumulating since April 1981. This is apparently a violation of Act 64, P. A. 1979-long term storage, which requires a permit.....

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07 ____
08 ____
09 ____
10 ____
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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17 ____		
18 ____		
19 ____		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
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R5642

DEPARTMENT OF NATURAL R URCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

		DATE MM/DD/YY: 05-18-82	
ESTABLISHMENT: Hooker Chemicals and Plastics Corporation	NO.: B-2422	QUARTER: MAY	NO.: 02
NUMBER AND STREET	CITY	STAFF: L. Koivuniemi	NO.: 97
CONTACT	TITLE	COUNTY: Lenawee	NO.: 46
PRIMARY ACTIVITY: Page 2		DISTRICT: Ann Arbor	NO.: 08

REMARKS:

if storing longer than one year.

Mr. Fredrick informed us that the only reason the drums were still on site was because they had problems getting approval from Cecos; therefore, the company switched to Chemical Waste Management in Alabama and was working on a contract and getting a truck in to ship the waste. The shipping date had not been set yet.

Accepting Unmanifested Hazardous Waste:

When asked why the drums were in such bad shape, i.e. leaking and corroded, Mr. Fredrick said many of the drums had arrived that way as returned product or off spec material from companies which Hooker had originally supplied, as well as, it was a bad winter. Most of these companies returning this waste pay Hooker a disposal cost of $120 per drum, occasionally a company may get a credit toward their next purchase from Hooker.

When I asked to see the manifests for these off-spec or returned products, the company informed me that the waste was not manifested because Hooker made the decision after the returned drum contents were inspected by Hooker to determine if Hooker could use or recycle the waste. I informed Mr. Fredrick and Richard Speed that the material "being beneficially used or reused or legitimately recycled or reclaimed" 40CFR 261.6, need not be manifested. But at the point Hooker has decided it can not reclaim this material and therefore the waste is to be disposed of, it is a waste, and also, Hooker has accepted an unmanifested hazardous waste if it is hazardous (40 CFR Part 261, Identification of Hazardous Waste).

Roy Schrameck informed Mr. Fredrick and Richard Speed that it appeared Hooker may be required to conduct a MDNR approved hydrogeological survey to determine if Hooker's practices of waste disposal had created ground water contamination. The company did not react negatively to Roy's suggestion for a hydro-survey.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
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19		
00 OTHER (explain)		

COMPLIANCE STATUS

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R5642

DEPARTMENT OF NATURAL F URCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 05 18 82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corporation	B 2422	MAY	02
NUMBER AND STREET	CITY	STAFF	NO.
		I. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
		Tenawee	46
PRIMARY ACTIVITY		DISTRICT	NO.
		Ann Arbor	08

Page 3 of 3

REMARKS:

Request for Pictures and Samples:

Roy and I asked the company officials if they had any objections to our taking pictures and samples. Richard Speed asked John D. Cashner, Plant Manager, for permission. Mr. Cashner came in to Mr. Speed's office where we were waiting and said it was all right.

I took twenty-two pictures and Roy took three samples from the ground, (description attached). We saw six different drum storage areas. Apparently, pictures were lost in process by Kodak since they were not returned to me from Kodak. Mr. Fredrick insisted that the company was not presently storing ignitible or reactive waste as reported in their Part A application to the U.S. EPA. I observed in storage area (2) at least one drum labeled Industrial Solvents; therefore, I am not convinced that Mr. Fredrick was accurate in this statement. Therefore, since Roy and I did not have the proper equipment to sample drums, I will be returning to Hooker with the proper sampling equipment to verify what is in some of the drums, and compare these samples to what Hooker has in their operating record (as required by 40 CFR 265.73).

Roy and I also looked at an area of 4,000 gallon storage tanks in the basement of the west manufacturing building, used to store corrosive products going out (e.g. nickel nitrate). These tanks may be used to store hazardous waste if needed in the future.

Hooker's Prdt labeling system:

yr. area Batch #

9 1 2373 The 9 refers to 1979.

91273-cold cleaner lying on its side next to fence area (2)

Size of storage area (2) (estimated): 29 drums X 3 drums X 15 drums equals approximately 1,300 drums.

Mr. Fredrick said he "had 935 drums stored in back and 150 across the street". Also, in the future the company hoped to have only 80 drums in storage at a time.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
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D. ON A SCHEDULE MEETING INCREMENTS
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MICHIGAN DEPARTMENT OF NATURAL RESOURCES Gade

MJT-cc1

INTEROFFICE COMMUNICATION

July 7, 1982

TO: File, W.Q.D., OHWM, U.S. EPA Region V

FROM: Linda Koivuniemi, A.Q.D. Ann Arbor

SUBJECT: Log of Pictures taken during three RCRA Investigations at Hooker Chemicals and Plastics Corporation, Morenci, MI

Date pictures (Standard 50 mm lens) were taken by L. Koivuniemi:

(1) May 18, 1982: Took 22 pictures, but two were essentially the same- just different exposure, therefore, only 21 different pictures: #1 thru #21. Roy and I collected 3 surface samples, but I wanted to sample drums because, for example, the company insisted there were no solvents stored in area (2); I noted a green drum near the center labelled industrial solvents. Since, we did not have equipment to sample drums, I planned to make arrangements in Lansing the next day 05-19-82 to get help and/or equipment to sample these drums by 05-20-82 or 05-21-82.

When I checked in Lansing to find out how to get the drums sampled before the end of the week, I was informed by Lyle Rowell that he would make the necessary arrangements because he may be needed for a criminal investigation. I agreed with Lyle that a joint investigation would be fine, but I wanted to sample drums before the weekend.

Without informing me, Lyle decided to go to Hooker and take samples alone on 05-20-82, and called me on Friday, 05-21-82. I had to start all over trying to get sampling equipment and arrange drum sampling because Lyle did not sample drums which I felt to be important. Hooker complained to Lyle about the number of sampling investigations. Lyle informed the company I was likely coming again, but that I would call before, if I wanted any drums moved which required a forklift. I did not call before my investigation on 05-27-82; therefore, I could not request the company to move barrels and sample the green drum labelled industrial solvents in storage area (2), see picture #16, which would have documented solvents, likely ignitable, within 50 feet of property line.

(2) May 27, 1982: Only one picture taken on this date: #22.

(3) June 22, 1982: Took 16 pictures in area (6): #23-38: Four samples: results not back as of 07-07-82; Roy delivered samples to ESD lab on 06-23-82.

Key: Picture # : time : camera setting
A. location
B. comments

May 18, 1982

#1: 3:15 PM : F 5.6, 60
A. Westside of storage area (2) -next to fence between river and storage pad.
B. Roy Schramack, W.Q.D. #1, collecting sample #1, greenish-dark; 19,000 mg/kg (ppb) or 19 ppm PCB-A1242 and 47,000 mg/kg (ppm) CR-TOT.

#2: 3:16 PM : F 1.7, 60
A. West side of storage area (2) - Picture taken while standing next to fence and looking east toward manufacturing building.
B. Green/black waste on storage pad.

#3: 3:20 PM : F 4, 60
A. West side of storage area (2) next to fence, barrels lying down in background are near the storage building.
B. Sample #2, collected by Roy Schrameck. High levels of PCB's: 2,500,000 ug/kg (ppb) or 2.5% A1242; and 2,500mg/kg (ppm) CR-TOT.

#4: 3:24 PM : F 8, 60
A. S.W. side of storage area (2), note storage building in background, adjacent to river.
B. Picture #5 (below) is a close-up of the corroded drum in this picture.

#5: 3:25 PM : F 2.8, 60
A. S.W. side of storage area (2), on N. side of storage building next to river, storage building in background.
B. Note corroded condition of drum.

#6: 3:28 PM : F 5.6, 60
A. North side of storage building; south side of storage area (2) - approximately 20 ft. from the river.
B. Note hole in drum-contents were apparently allowed to leak out.

#7: 3:30 PM : F 8.0, 60
A. Again, north side of storage building, in area (2), wide angle of picture #6.
B. Note drum with hole near bottom (center bottom of this picture)-same drum as picture #6.

#8: 3:34 PM: F 11, 60
A. East side of storage area (2)
B. Note black boards under storage drums in S.E. side of storage area (2)

#9: 3:35 PM: F 11, 60
A. East side of storage area (2)
East edge of stored drums is approximately 50 ft. from the river.
B. If the green barrel in the center held industrial solvents, as it was labeled, it would have been less than 50 ft. to the property line. But we could not get to it to sample and company insisted there were no ignitable liquids ($< 140^{\circ}F$) in this storage area (2) Later, May 27, we sampled and found ignitable liquids on the eastern edge, but this edge was about 50 ft. from property line (I paced it off). Note leaker in left bottom of photo.

#10: 3:40 PM : F 8, 125
A. New Area: storage area (3) note Mfg. building in background.
B. Note poor condition of drums.

#11: 3:42 PM : F 8, 125
A. Center of storage area (3).
B. Roy Schrameck collecting sample #3 from ground-no concrete pad. GW 749 Lot 689-old raw material, dye-greenish blue.

#12: 3:45 PM : F 8, 125
A. Single drum with dark colored, oily ooze on outside in area (3).
B. Roy Schrameck later sampled this (picture #22 taken 05-27-82) drum.

#13: 3:50 PM : F 8, 125
A. Storage area (3) - note mfg. building in background.
B. Richard Fredricks on north side of storage area (3). Storage area (3) is where 70% ethylamine was stored open and evaporating.

#14: 3:53 PM : F 4, 60
A. N.W. Corner of property, next to river, note fence in background. Storage area (5).
B. This drum was an example of open drums in storage with various types and amounts of waste/junk.

#15: 3:55 PM : ?-did not document camera setting.
A. Storage area (5) -near river.
B. Note stained material on ground-no storage pad.

#16: 3:56 PM: F 8, 125
A. Back to original or main storage area (2) (Eastside), trees on river bank in background.
B. Note green barrel-was labeled industrial solvent.(refer to picture #9).

#17: 3:57 PM : F 8, 125
A. Small storage area (1).
B. Note Mfg. building in background.

#18: 3:58 PM: F 5.6, 60
A. Storage area (1) - near center.
B. Single corroded drum: company thought it could be X185 Bonderite make-up.

#19: 3:59 PM : F 16, 125
A. Tanks, loading rack on south side of Mfg. building.
B. Note barrel at base of loading rack which is used to allow waste acid to drain through to ground (therefore ground water).

#20: 4 PM : F 5.6, 125
A. N.E. side of storage area (6).
B. This drum labeled Leaker Bottom was empty, my field note book is in center-bottom of picture.

#21: 4:03 PM : F 5.6, 125
A. Storage area (6) -south side of storage building.
B. The company insisted there was absolutely no reason for me to be inspecting this area because only empty drums and nonhazardous baghouse dust was stored here. As one is able to observe, there was no easy route through these drums, since there was no aisle space for movement to the back, i.e. west side of this storage area. Later, Lyle Rowell of Environmental Enforcement Division

had an aerial photo taken showing wastes haphazardly lying around behind the wall of drums showing in this photo. Note pictures of this area (6) taken June 22, 1982, #23-38.

May 27, 1982

#22: 12:24 PM: Took with a flash, F 5.6, 125, the reason the flash was needed was because it had just gotten dark; it started to rain after this photo was taken.

A. Roy Schrameck collecting sample #4 from area (3). We did not get pictures of samples 1,2, or 3. All four samples were split with Hooker.
B. Company said this was likely oil and emulsifier. ESD lab tested and found pH 3, flash point approximately 190°F.

June 22, 1982: It had rained the night before these pictures were taken in area (6):

#23: 12:12 PM : F 5.6, 125

A. Sample #1 collected by Roy Schrameck in area (6), next to the river.
B. Sample #1 collected from surface of ground next to fence. Note dark-stained material forming a pathway to the river; also, hole in fence. Even though it had rained and the barrels and ground were still wet the storage pad and surface of ground were heavily stained with green-yellow, black liquid wastes.

#24: 12:16 PM : F 8, 125

A. Area (6) - west side, collection point for sample #1.
B. This is a wider angle of picture #23, supra. Please note the yellow-green, dark colored material leaching to river.

#25: 12:17 PM : F 8, 125

A. Sample #2-another surface ground sample collected a few feet south of sample #1 in area (6) along river.
B. Note liquid storage drum in foreground; company could not identify the contents. We could not collect a sample of this waste because it would have to be placed in a recovery drum. The fiberpac barrel's outer shell had disintegrated. Company promised to immediately place in recovery drum and sample to determine proper disposal and share the sample with the DNR.

#26: 12:18 PM : F 8, 250
A. Same as #25, supra: Close-up of where Roy collected sample #2, sample #2-visible on sample bottle.
B. Note dark- stained soil.

#27: 12:19 PM : F 5.6, 125
A. Approximately 4 ft. to east of sample collection point #2. Sample #3.
B. Note green-yellow oil-like slick on ground in foreground.

#28: 12:20 PM : F 5.6, 60
A. Sample #4 collected by Roy Schrameck in area 6.
B. Note Roy collecting sample #4, the concrete appeared to have been broken down by the multicolored ooze on the pad surface.

#29: 12:21 PM : F 5.6, 60
A. Same as #28 above-after Roy finished collecting sample #4.
B. Note stained material on surface of pad in background. Also, the fiberpac barrel in this picture was leaking onto surface of concrete pad.

#30: 12:23 PM : F 11, 250
All four samples collected from surface of pad, or ground next to the fence are shown.

#31: 12:25 PM: F 11, 250
A. General area where samples were collected in area 6.
B. Note Richard Fredricks and Roy Schrameck. As noted before, company promised to save samples of these two fiberpac drums for me.

#32: 12:27 PM: F 8, 125
A. General condition of storage area 6 behind wall of empty or stainless steel drums, see Picture #21. The wall of drums are on left side of this picture.
B. Aerosol cans and drums have apparently leaked all or most of their contents. Company reported to me that they did not have records documenting the quantity or quality of waste in this storage area. They did not report this area to either the U.S. EPA or MDNR (Roy or myself). Vegetation in background is southern property boundary.

#33: 12:28 PM : F 5.6, 125
A. S.W. corner of Hooker property. Note where fence comes together in upper right of picture.
B. Picture #37 is a close up of material spilling from drums shown here falling against fence, right side of picture.

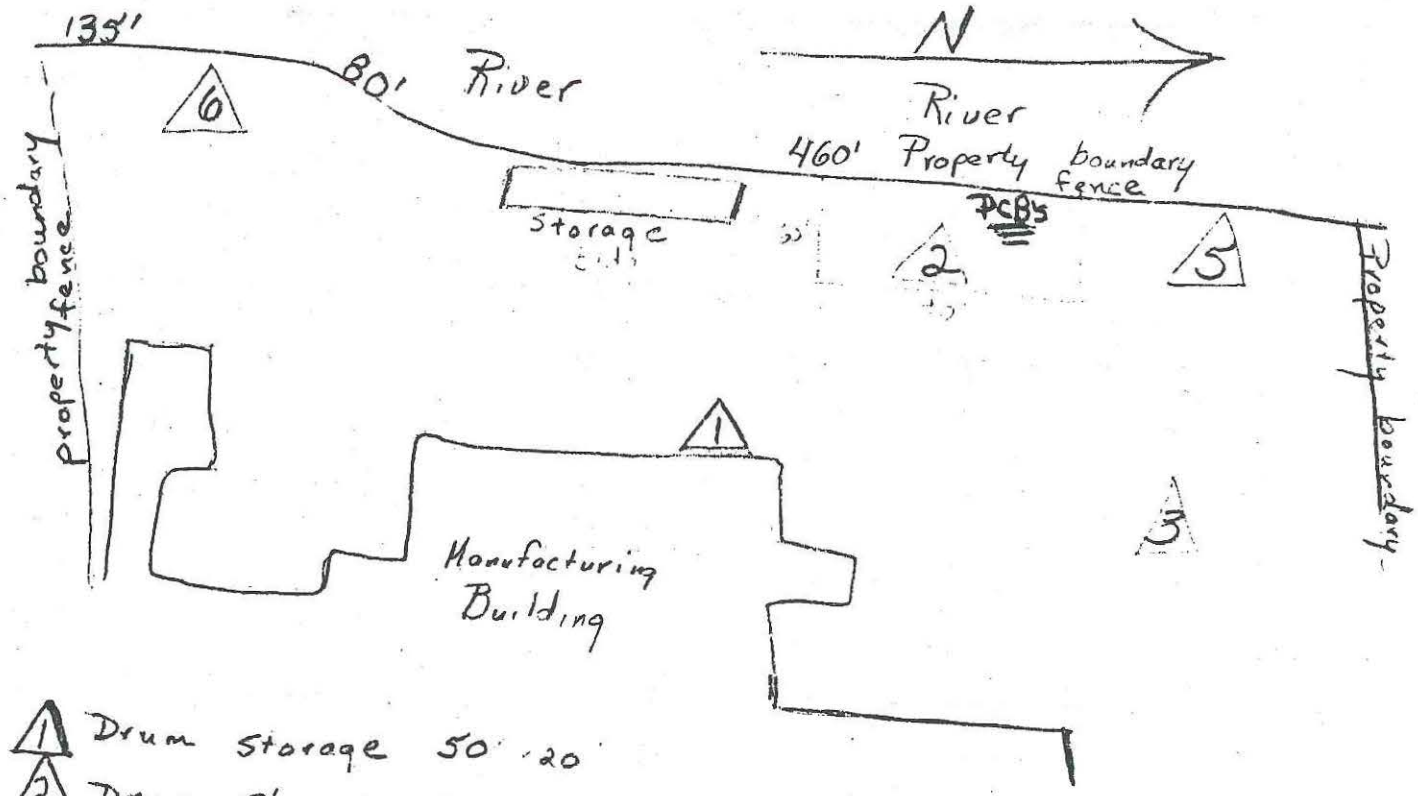
#34: 12:30 PM: F 8, 125
A. Barrel of lab samples-many open-in center of area 6.
B. Fredricks still insists these barrels and bottles became corroded over the winter; yet, he says this white powdered material is nonhazardous baghouse dust.

#35: 12:31 PM : F 11, 125
A. Area 6 - note southern property line fence in background.
B. Baghouse dust piles and yellow green-ooze on concrete pad surface. This was as bad in person as this picture shows.

#36: 12:33 PM: F 11, 125
A. Stainless steel drums in N.W. section of area 6.
B. Drum labeled "nitric acid" was hissing and bubbling (rain water on top of drum). R. Fredricks removed bung to allow pressure to be relieved.

#37: 12:34 PM: 1.7 1/2, 60
A. Next to river, west side of area 6.
B. This is a close up of drums on and near fence-leaning against wood pallet (see picture #33 for wider angle).

#38: 12:36 PM : F 4, 250
A. S.W. section of area 6.
B. Looks like lab chemicals-obviously not carefully controlled-not part of RCRA required operating record.



1 Drum Storage 50' x 20'
2 Drum Storage 60' x 90'
3 Drum storage 30 x 20'
4 Drum storage 8' x 24' - not shown in this diagram
5 Drum Storage } added by L. Koivunieme
6 Drum Storage }

Hooker did not report storage areas 5 or 6 on their Part A - application of 10-8-80.

Above diagram copied from Hooker's Part A - not to scale.

RECORD OF COMMUNICATION

☒ PHONE CALL ☐ DISCUSSI ☐ FIELD TRIP ☐ CONFERENCE
☐ OTHER (SPECIFY)

(Record of item checked above)

TO: Linda Koivuniemi, MDNR

FROM: SKSwanson

DATE 6-23-82

TIME 3:30 p.m.

SUBJECT: Hooker Chemical AKA PARKER AKA OXY METALS - MID058723867

SUMMARY OF COMMUNICATION

I told Linda I will be the tech. person working on this order.

She said she has additional info:

1. PCB sampling found extremely high levels
2. She found an additional drum storage area in a MDNR air photo, and subsequently went to inspect it.
3. Her original photos, believed lost, turned up. She took additional photos. She will send copies.
4. The Co. changed its name again, no sale involved, to: Occidental Chemical Corp., Parker Surface Treatment Products Division.
5. She will send additional info (sample results, photos, activity reports etc.) to me by next week.

CONCLUSIONS, ACTION TAKEN OR REQUIRED

I told Linda I will review her order and be ready to add her new info.

INFORMATION COPIES TO: File.

EPA Form 1300-6 (7-72) REPLACES EPA HQ FORM 6300-3 WHICH MAY BE USED UNTIL SUPPLY IS EXHAUSTED.

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED
☐ PERMIT ACTION
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED
☐ NESHAP
☐ NSPS
☐ REVISED STATUS

To: Sally Swanson - USEPA Reg V direct

DATE MM/DD/YY: 06-15-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corporation(formerly Parker Chemical)	B-2422	JUNE	02
NUMBER AND STREET	**CITY**	**STAFF**	**NO.**
322 W. Main Street	Morenci	L. Koivuniemi	87
CONTACT	**TITLE**	**COUNTY**	**NO.**
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		**DISTRICT**	**NO.**
Chemical Production-Mixing		ANN ARBOR	08

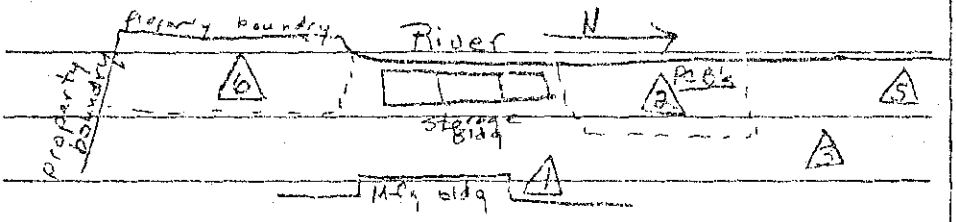
REMARKS:

Dhruman Shah, Permit Engineer and I met with Richard Speed at the company to discuss the Permit to Install applications numbered 243-82, 244-82, and 245-82. Dhruman needed more process information and wanted to look at existing equipment. The company is sending Dhruman a letter with the additional requested information.

Could not conduct a scheduled investigation since the processes were not operating at the time of the meeting, afternoon of 6-15-82.

RCRA (Resource Conservation Recovery Act-Haz. Waste):

I had received a telephone call (06-08-82) and an aerial photo (June 9, 1982) from Lyle Rovell of Environmental Enforcement Division (E.E.D.) informing me that there were some more drums that neither Lyle nor I had previously known about. Therefore, I asked Mr. Fredricks about storage area 6 which is located on the river on the south side of the storage building.



Mr. Fredricks insisted that there was not any hazardous waste stored there-only nonhazardous baghouse dust (phosphates) and empty drums.

I insisted that I needed to take a look. Mr. Fredricks continued to want to know why I thought there was anything back there that may be a problem. Finally, I told him that I had seen an aerial photo that had been taken recently and wanted to check out the area. Then Mr. Fredricks said it was all right and I climbed (squeezed) through several rows of drums to discover a maze. There were approximately 100 drums of which many were corroded, leaking or open. Several drums were open and filled with laboratory bottles filled with samples. Two fiberpak barrels with a...

PROJECT

01	MAJOR SOURCE
02	MINOR SOURCE
03	RESIDENCE
04	MEETING – CONFERENCE
05	TRAINING
07	
08	
09	
10	
00	OTHER (explain)

	SURVEY ACTION	TYPE	NO.
01	EMISSION POINTS INVESTIGATED		
02	VISIBLE EMISSION EVALUATION		
03	SOURCE TEST (STAFF)		
04	SOURCE TEST (COMPANY)		
05	GRAB SAMPLE		
06	PICTURES TAKEN		
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18			
19			
00	OTHER (explain)		

COMPLIANCE STATUS

A.	IN COMPLIANCE
B.	UNKNOWN COMPLIANCE
C.	OUT OF COMPLIANCE NOT ON A SCHEDULE
D.	ON A SCHEDULE MEETING INCREMENTS
F.	ON A SCHEDULE, NOT MEETING INCREMENTS
F.	ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

RB842
3/77

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ RECEIVED ☐ REGIONAL
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM DD YY: 06-15-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics. Corp.	B-2422	JUNE	02
NUMBER AND STREET	CITY	STAFF	NO.
		L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
		LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Page 2		ANN ARBOR	08

REMARKS:

plastic internal liner were laying on their side, one was leaking. The fiberpac outer shell had broken down and only the plastic liner was holding the liquid. The liquid was corrosive; it had dripped on & eaten through some wood under it.

I informed Mr. Fredricks that this "mess" had to be cleaned up right away, since everytime it rained the contaminants washed directly into the river immediately adjacent to these leaking drums.

Mr. Fredricks did not know what was in these two fiberpac barrels containing liquid. He said the company would analyze them to determine proper disposal and clean up the area.

When I got back to the office, I called Roy Schrameck of W.Q.D. #1 to inform him of this newly discovered improper storage area. Roy was in Chicago; therefore, I left him a message to call me when he returned.

Monday June 21, 1982 :

Roy called me back on Monday 06-21-82. Roy had received the results from our 05-18-82 sampling showing extremely high levels of PCB's on the ground near the river.

Therefore, Roy and I decided it was necessary to document what was in this newly discovered unacceptable storage area. Roy called Ron Waybrandt, PCB Coordinator in Lansing and Lyle Rowell of E.E.D. Ron W. told Roy to follow up as planned. Lyle was not in; therefore, Roy Schrameck talked to Warren Hutchinson of E.E.D. who informed Roy that Lyle did not need to be involved in our investigation or meeting with Hooker, on Tues. 6-22-82.

Roy and I arranged to go to Hooker the following day June 22, 1982.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

	SURVEY ACTION	TYPE	NO.
01	EMISSION POINTS INVESTIGATED		
02	VISIBLE EMISSION EVALUATION		
03	SOURCE TEST (STAFF)		
04	SOURCE TEST (COMPANY)		
05	GRAB SAMPLE		
06	PICTURES TAKEN		
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19			
00	OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

R5042
3 77

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

COMPLAINT RECEIVED ☐ | PERMIT ACTION ☐ | ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ | NESHAP ☐ | NSPS ☐ | REVISED STATUS ☐

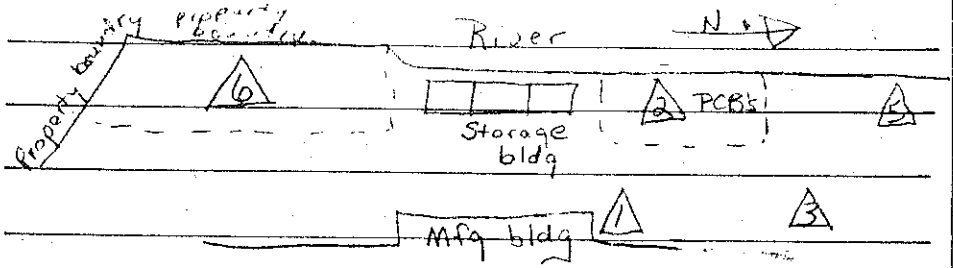
To: Sally Swanson - USEPA Region V Direct

DATE MM/DD/YY: 06-22-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	B-2422	JUNE	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing Pg 1 of 5		ANN ARBOR	08

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area 6 which is south of the storage building next to the river.



There was no easy path to get back to the fence next to the river in storage area 6. First we tried the south end of storage area 6 but drums and lab. samples haphazardly strewn made it impossible to get to the west side of this storage area via this path. Firally, we got through by going along the south side of the storage building and pushing in the fence to get to the west side of storage area 6 which is on a concrete pad.

Mr. Fredricks and Lee Huffaker accompanied Roy and me while we collected 4 samples from the ground-no drums were sampled. The drums which we were most concerned about were two badly decomposed plastic lined fibpac barrels laying on their sides. One of which was leaking on to the ground and had eaten into the wood that the barrel was placed on. The liquid was possibly a chromic acid-like substance, since there was a greenish-yellow material near these two barrels on the ground. Roy sampled this before mentioned material; but, since it had apparently rained heavily the night before the sample was probably more diluted than it would have been if we had collected before the rain. There was evidence of rain because the area was still wet, as it had just rained.

When I had originally seen this contaminated part of area 6 on 6-15-82, there had been a lot more multi-colored liquid on the ground. This likely had been washed away by the recent rain. There was evidence that water washed directly from this storage pad into the river, because there were obvious drainage areas. Some of which were stained dark-not unlike an oil slick.

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07 _____
08 _____
09 _____
10 _____
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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17 _____		
18 _____		
19 _____		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

R5642
3/77

DEPARTMENT OF NATURAL RESOURCES

AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ RECEIVED ☐ NESHAP

☐ PERMIT ACTION ☐ NSPS

☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

		DATE MM/DD/YY	06-22-82
ESTABLISHMENT: Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	NO. B-2422	QUARTER: JUNE	NO. 02
NUMBER AND STREET: 322 W. Main Street	CITY: Morenci	STAFF: L. Koivuniemi	NO. 97
CONTACT: Richard Fredrick	TITLE: Prod. Sup't.	COUNTY: LENAWEE	NO. 46
PRIMARY ACTIVITY: Chemical Production-Mixing		DISTRICT: ANN ARBOR	NO. 08

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area (6). (Continuation Page 2)

These areas of dark colored grass and soil may have been stained by the company's Parco T-8 which had been contained in small aerosol cans (approximately 16 oz. size). Several piles of these aerosol cans were strewn on the ground and most were corroded and empty. Parco T-8 is an oil base lubricant similar to WD40.

Many piles of the baghouse dust were exposed to the weather and was being washed away each time it rained.

The 70% ethylamine drum which was incorrectly stored open outside during earlier inspections had been moved into the storage building, but was still stored open and was almost empty. Disposal had been illegally accomplished by allowing this material to evaporate directly to the atmosphere.

I took pictures of Roy sampling and of the storage area (6).

PCB's:

Two samples of surface/contaminant collected 5-18-82 in storage area (2) had high levels of PCB's and chromium, sample #3 from area (3) was not as high:

	A-1242 PCB ug/kg (ppb)	CR-Total mg/kg (ppm)
Sample #1area 2	19,000	4,700
Sample #2area 2	2,500,000	2,500
Sample #3area 3	6,500	37

Clean-up and Company Sampling:

After we collected our 4 samples and took pictures of storage area (6), we had a meeting with John Gashner, Plant

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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19		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
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R5642

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED
☐ PERMIT ACTION
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED
☐ NESHAP
☐ NSPS
☐ REVISED STATUS

DATE MM/DD/YY: 06-22-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	B-2422	JUNE	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing		ANN ARBOR	08

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area (6). (Continuation Page 3)

Manager, Mr. Richard Fredricks; and Lee Huffaker, Chemist. We requested and obtained as much of their operating record as was available, i.e.:

(1) 24 Manifests of Waste shipped since May 1982

(2) 29 Generator's Waste Material Profile Sheets

(3) Logs of : Chemical waste to ship, transfer record, and chemical waste already shipped.

Much of the waste stored on the west side of area (6) ~~near the river was not labeled and the company could~~ not specifically identify it. The company promised to ~~start immediately to contain all leaking waste~~ and test it to determine proper handling and disposal. ~~The company's operating record is much more deficient~~ then I had originally determined.

Slowly, more and more information is dragged out of the ~~company concerning quality, quantity and location of~~ hazardous waste stored. The company has been less than accurate ~~in answering my questions concerning their hazardous~~ waste activity and practices.

After we had copies of their operating record (required (RCRA) ~~by Appendix I), I asked the company if they had~~ PCB's on the property either in use or storage. They ~~said no-absolutely not-not even in any transformers because the~~ transformers had been tested.

Then Roy S. gave them a copy of the testing results of the ~~3 samples we collected 5-18-82. The three officials could~~ explain the chromium levels because the company used chromium; but the 2.5% PCB-A 1242 was not readily explained. We informed the company that they had to ~~determine the extent of the contamination and the source~~ of the PCB's, as well as clean up the contaminated environment, i.e. soils, river sediment and ground

PROJECT

01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07 _____
08 _____
09 _____
10 _____
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
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17 _____		
18 _____		
19 _____		
00 OTHER (explain)		

COMPLIANCE STATUS

A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 06-22-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	B-2422	JUNE	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivuniemi	07
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing Page 4		ANN ARBOR	08

REMARKS:

water if necessary.
The company agreed to have this area (2) cleaned up and leaking or leaching waste in recovery drums by July 6, 1982 and to have a study plan by approximately July 12 or 13 when the parent company's environmental audit is conducted at the Morenci facility. (audit)

Source of PCB's ?:

The company informed us that they use only internally generated waste oil for dust control; therefore, a waste oil for dust control from an outside source was not responsible for this PCB contamination.

The company had transferred and stored Reacto-bond (an oily product) in area (2) ; therefore, they will be checking to see if this product is contaminated with PCB's through an inadvertent side reaction.

I called Dave Long (6-24-82) , ESD Lab; he said that there was practically no chance there was a lab error, Also, since total oil (FE-Oil) was 54,000 mg/kg or ppm or 5.4% that the oil in the sample #2 was approximately 46% PCB.

I also asked Dave to make sure chain of custody was maintained and to save these three samples indefinitely or until notice from Roy-since they were Roy's samples and may be important to either a civil or criminal enforcement case.

Company promised to save samples of liquid in the two badly decomposed plastic lined fiberpac drums, as well as their baghouse dust for me to pick up. The company thought the liquid in these two barrels was CWM #66701. I tried to decode this by looking up Code 66701 on the Generator's Waste Management Material Profile Sheet, but the company had not given me this document. I have 66700 and 66702, but not 66701.

U.S. EPA Phone call of June 23, 1982 :

Received telephone call from Ms. Sally Swanson of.....

PROJECT
01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
09		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
00 OTHER (explain)		

COMPLIANCE STATUS
A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

R5643

DEPARTMENT OF NATURAL RESOURCES
AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

☐ COMPLAINT RECEIVED ☐ NESHAP
☐ PERMIT ACTION ☐ NSPS
☐ ANNUAL COMPLIANCE INVESTIGATION COMPLETED ☐ REVISED STATUS

DATE MM/DD/YY: 06-22-82

ESTABLISHMENT	NO.	QUARTER	NO.
Hooker Chemicals and Plastics Corp. (Formerly Parker Chemical)	B-2422	JUNE	02
NUMBER AND STREET	CITY	STAFF	NO.
322 W. Main Street	Morenci	L. Koivuniemi	97
CONTACT	TITLE	COUNTY	NO.
Richard Fredrick	Prod. Sup't.	LENAWEE	46
PRIMARY ACTIVITY		DISTRICT	NO.
Chemical Production-Mixing		ANN ARBOR	08

Pg 5 of 5

REMARKS:

Roy Schrameck, W.Q.D. #1, and I inspected storage area 6 . (Continuation Page 5)

U.S. EPA Region V, Chicago, Telephone (312) 886-7482. She is assigned to write and coordinate the enforcement or compliance order with the company. I promised to get the information I obtained since June 14, 1982 off to her within the next week.

Telephone Call to Lyle Rowell of Environmental Enforcement Division on June 23, 1982:

I called Lyle to make sure he knew about: all of my inspections at Hooker and the high levels of PCB's in the samples collected in area 2 . Lyle confirmed that there was no need for him to be involved in the sampling or meeting with Hooker on June 22, 1982. Since the company is cleaning up the barrels and agreeing to do a hydro-geological study and perform the subsequent environmental clean-up as necessary, it appears a criminal court case may not be pursued. I will continue to inform Lyle of important findings which he may need.

PROJECT
01 MAJOR SOURCE
02 MINOR SOURCE
03 RESIDENCE
04 MEETING – CONFERENCE
05 TRAINING
07
08
09
10
00 OTHER (explain)

SURVEY ACTION	TYPE	NO.
01 EMISSION POINTS INVESTIGATED		
02 VISIBLE EMISSION EVALUATION		
03 SOURCE TEST (STAFF)		
04 SOURCE TEST (COMPANY)		
05 GRAB SAMPLE		
06 PICTURES TAKEN		
09		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
00 OTHER (explain)		

COMPLIANCE STATUS
A. IN COMPLIANCE
B. UNKNOWN COMPLIANCE
C. OUT OF COMPLIANCE NOT ON A SCHEDULE
D. ON A SCHEDULE MEETING INCREMENTS
E. ON A SCHEDULE, NOT MEETING INCREMENTS
F. ON A SCHEDULE, NOT KNOWN IF MEETING INCREMENTS

June 14, 1982

Linda Koivuniemi

TO: Al Howard, OHWM, MDNR
[redacted]

FROM: Linda Koivuniemi, A.Q.D.

SUBJECT: Hooker Chemicals and Plastics, Morenci
RCRA AND ACT 64 VIOLATIONS

Attached are:

(1) Three activity reports describing my recent RCRA investigations to Hooker Chemicals and Plastics, Morenci.

(2) A letter from John D. Kashner of Hooker dated June 1, 1982.

(3) RCRA inspection report.

(4) Draft EPA Compliance Order.

Please note in my three attached activity reports that this company has changed its story on more than one occasion:

(1) At the beginning the hazardous waste drums had been accumulating since April, 1981; then later the drums had been in storage prior to RCRA rules going into effect on November 19, 1980.

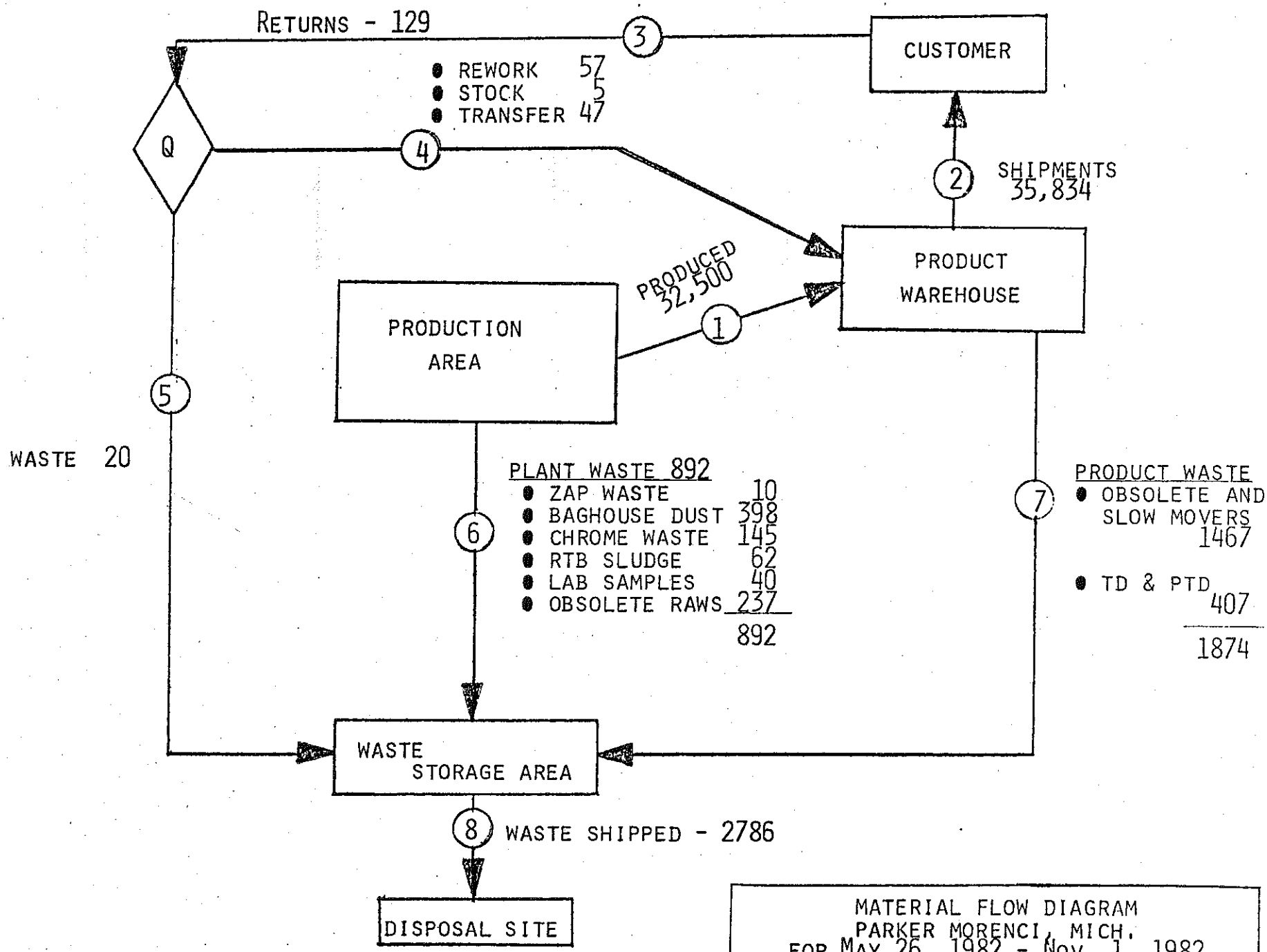
(2) Also, at the beginning the company would not accept returned product/waste unless the company returning the unused material paid a fee of approximately $120 per drum. Then, after I informed the company they were accepting unmanifested waste, they changed and said they accepted unused product back from the customer for credit.

It is my understanding that the Federal Register/Vol. 45, No. 229/Tuesday, November 25, 1980/Rules and Regulations, does not apply to the Hooker returned material because the returned product/waste is not regulated under 261.33, but hazardous based on its characteristics under Sub part C of 40 CFR 261.

Due to the serious violations caused by leaking and open hazardous waste drums, it is my belief that this company should be fined and issued the attached Compliance Order without further delay.

cc: Joe Boyle, U.S. EPA Region V (no attachments) sent directly to Chicago from the Ann Arbor Air Quality Office.

LKK:vl



MATERIAL FLOW DIAGRAM
PARKER MORENCI, MICH.
FOR MAY 26, 1982 - Nov. 1, 1982

MORENCI MATERIAL FLOW DIAGRAM

PERIOD MAY 26, 1982 - NOVEMBER 1, 1982

The following paragraphs explain the material flow through the Morenci facility for the period May 26, 1982, to November 1, 1982. A diagram has been drawn which helps to illustrate the flow.

The time period, or "WINDOW", chosen was the period for which waste manifests show a total of 2786 containers of material transported off-site to a disposal site.

The window indicates the numbers of containers of products produced, product returned from customers, production waste generated and the total material disposed of from the facility.

During the window time period, the plant produced a total of 32,500 containers of product shown as Item 1 on the diagram. This product is either a named finished product, or new experimental products from Parker Research and Development. These experimental products are called "TD's and PTD's". All products are placed in the product warehouse, as shown, and then can be shipped to customers. Shipments to customers totalled 35,834 containers for the same period, (Item 2).

Some products are returned from customers to the plant as shown in Item 3. This is due to many reasons; experimental products which did not perform, finished products which became obsolete, excess inventory at a customer's plant which is not needed, shutdown of a customer plant or process, or products shipped in error to wrong customer or location. A total of 129 containers were returned during this time period (window).

The returned products are placed in a quarantine area for evaluation by quality control, designated by "Q" on the diagram. Products which can be reworked, repackaged or restocked are shown going to the product warehouse as Item 4, totalled 109 containers.

Products which are found to be incapable of rework are designated as waste and sent to waste storage, shown as Item 5, for disposal. A total of 20 containers were so designated during this period.

In addition, waste is normally generated in the production area. This consists of baghouse dust, incinerator ash, chrome area waste, laboratory samples, floor sweepings and product which does not meet specification as well as obsolete raw materials which cannot be used, or returned to vendor. These are shown as Item 6 on the flow diagram.

Other waste is generated in the product warehouse. This consists of obsolete products, TD's and PTD's which were stocked for customers, but never shipped and cannot be reworked. These are represented as Item 7.

The total waste stream, Item 8, is composed of Streams 5, 6, and 7 as shown. This is transported off-site by a licensed waste hauler to an authorized disposal site.

The total material flow, in summary, consists of the 2786 containers. Of these, 20 containers were from customer returns designated as non-returnable to production, 1874 containers from the product warehouse and 892 containers generated in the production area.

In summary, the waste disposed of from the facility was composed as follows for our "window":

	CONTAINERS
From Customer Returns, Item 5.....	20
*From Production, Item 6.....	892
From Product Warehouse, Item 7.....	1874
TOTAL WASTE DISPOSAL, ITEM 8.....	2786

(*Detail breakout by category is on flow diagram.)

Total waste disposal containers of 2786 are 8.6% of total product produced (Item 1), during the time period reviewed.

For customer returns, the summary is as follows, from the plant receivers:

5 - Containers were restocked, Item 4.
57 - Containers were reworked, Item 4.
47 - Containers were transferred, Item 4.
20 - Containers were scrapped as waste, Item 5.

129 - TOTAL CONTAINERS WERE RETURNED FROM CUSTOMERS, ITEM 3.

The above numbers do not present a precise material balance, due to the short time period of the review, but are considered typical of the proportions produced at any "window" chosen as a moving tabulation of the various material streams. Due to the fact that we are looking at a moving window, lines (streams) will not necessarily be additive.

KEY TO LOG

A. Chrome Waste

B. Reactobond Waste (Sludge)

C. TD's and PTD's (Experimental Product)

D. Baghouse Dust

E. Finished Product

F. Raw Material

G. Lab Retains

H. Process Waste (ZAP-dilute zinc acid phosphate, etc.)

I. Floor Sweepings/Pad Sweepings

J. Incinerator Ash

Change of name (now): Hooker Chemical and Plastics Corp.

RCRA Inspection Report

EPA Identification Number: M I D 0 5 8 7 2 3 8 6 7

Installation Name: Oxy Metal Industries Corporation (on Part A)

Location Address: 322 W. Main St.

City: Morenci State: Mich.

Date of inspection: ~~Fri. May 14 82~~ Tues. May 18, 1982 and Thurs. May 27, 82 Time of inspection (from) 10AM (to) 1PM

Person(s) interviewed	Title	Telephone
Richard G. Fredrick	Production Superintendent	(517) 458-2221
Joyce Hutchison	Book Keeper	"
Lee Huffaker	Chemist	"

Inspector(s)	Agency/Title	Telephone
Linda Koivuniemi	MDNR-AQD Envir. Specialist	(313) 665-9461

Installation Activity (mark only one box) — Inspection Form(s)

- [X] Treatment/(Storage)/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation — A
- [ ] Treatment/Storage/Disposal (no generation or Transportation) — A
- [ ] Generation and Transportation — B, C
- [ ] Generation only — B
- [ ] Transportation only — C

~~[illegible]~~

RECEIVED
JUN 16 1982
ACT 64

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	[X]	storage in containers	I
S02	[X]	storage in tanks	J
T01	[ ]	treatment in tanks	J
S04	[ ]	storage in surface impoundment	K,F
T02	[ ]	treatment in surface impoundment	K,F
D83	[ ]	disposal in surface impoundment	K,F
S03	[ ]	storage in waste pile	L
D81	[ ]	disposal by land application	M,F
D80	[ ]	disposal in landfill	N,F
T03	[ ]	treatment by incineration	O/P
T04	[ ]	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	[X]	APPENDIX	GN
TRANSPORTER	[ ]	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

None

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

None

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?		X		
b. Facility expansion?		X		
c. Change of owner or operator?		X		
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			Determine from formulation of off spec. prod. - or obselete + testing if needed.
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X			
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance? or		X		
b. i. Artificial or natural barrier around facility? and	X			fence
ii. Controlled entry?	X			gate
c. Danger sign(s) at entrance?	X			
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	X			But does not correct problems to date, i.e. May 27, 82

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	X			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?			X	None
ii. safety and emergency equipment?	X			1. Self-contained breathing apparatus 2. fire extinguishers
iii. security devices?		X		
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?		X		NA
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?			X	
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	X			only inspects container storage
d. Are areas subject to spills inspected daily when in use?		X		
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	X			Containers only - once/wk
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	X			
ii. the name of the inspector?	X			
iii. a notation of the observations made?	X			not very good - did not note leaking drums
iv. the date and nature of any repairs or remedial actions?	X			very few - repairs were not environmentally acceptable
5. Do personnel training records include: 265.16				
a. Job titles?	X			
b. Job descriptions?	X			

* NA - not applicable

	YES	NO	NI	Remarks
c. Description of training?	X			
d. Records of training?	X			
e. Did facility personnel receive the required training by 5-19-81?	X			
f. Do new personnel receive required training within six months?	X			
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?			X	Plan on conducting an annual review

6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17

a. Special handling?	~~X~~	X		Drums of ignitble waste uncovered - ethylamine
b. No smoking signs?	X			
c. Separation and protection from ignition sources?	~~X~~	X		Stored uncovered ignitble waste

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

Maintenance and Operation of Facility: 265.31	YES	NO	NI	Remarks
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	X			leaking drums
2. If required, does the facility have the following equipment: 265.32				
a. Internal communications or alarm systems?		X		None in storage (main area ② outside
b. Telephone or 2-way radios at the scene of operations?		X		telephone - inside only
c. (Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?		X		sprinklers - inside main bldg.

Indicate the volume of water and/or foam available for fire control:

Storage tank - 50,000 gal H_2O + city water sys.

3. Testing and Maintenance of Emergency Equipment: 265.33				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			fire extinguisher
b. Is emergency equipment maintained in operable condition?	X			based on Company's verbal answer
4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34		X		none in outside stora
5. Is there adequate aisle space for unobstructed movement?		X		Temporary - problem with getting rid of drums - should get drums moved this month or Jan
6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?		X		Not writtenverbal arrangement

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			SPCC Plan
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			[redacted]
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	X			Site only - but plan to send to fire chief and police, and receive written documentation. 4/82-A

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	X			
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			X	No reported emergency to date

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

off-site waste

	YES	NO	NI	Remarks
Use of Manifest System 265.71				- no manifested waste - waste is accepted without manifest
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	X	—	- Company contends returned prdt, and if it is disposed of by Hooker is not a waste.
b. Are records of past shipments retained for 3 years?	—	X	—	
2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72	—	X	—	
Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	X	—	—	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, (storage,) or disposal as required in 40 CFR Part 265 Appendix I?	X	—	—	Generally: yes, except date because of back log. prior to Nov. 19, 1980. It is difficult for the company to determine quantity, quality & type of all waste in storage.
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	**	X	—	
***iii. A map or diagram of each cell or disposal area				does not have any manifest for returned prdt which is actually a waste which company receives payment for disposal in many cases.

** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	—	—	—	NA
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X	—	—	Most are available but not well logged and are difficult to find.
v. Reports detailing all incidents that required implementation of the Contingency Plan?	—	—	X	None to date
vi. All closure and post closure costs as applicable?		—	—	
4. Availability of Records 265.74 Are all facility records required under 40 CFR Part 265 available for inspection?	X	—	—	
5.**Unmanifested Waste Reports 265.76 a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?	X	—	—	
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				Hooker will not give me this information. They do not want to be involved in blowing the whistle on their customers.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G: CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	X			
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	X			
ii. maximum hazardous waste inventory?	X			
iv. estimated year of closure?			X	Does not know
v. schedule of closure activities?	X			
c. Has closure begun?		X		
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?		X		N A
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				NA
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

Section I - [illegible] AND MANAGEMENT OF CONTAINERS (Pg. 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171		X		Some are being transferred - more should have been
2. Are containers compatible with waste in them? 265.172	X			
3. Are containers managed to prevent leaks? 265.173		X		
4. Are containers stored closed?		X		even a 70% ethylamine (flamable was stored open).
5. Are containers inspected weekly for leaks and defects.	X			but corrections were not made to leaking drums
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176			X	Company officials said - no, but due to lack of good records - I am not sure
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	X			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?		X		drums of ignitible waste open

2. Types of containers:
7051 - DOT 37M ≥ 25% line
7009 - steel drums

Section J - TANKS (Part 265, Subpart J)

	YES	NO	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192		X		company contends it is not storing h.w. in tanks presently
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?		X		NA - all are covered
3. Do continuous feed systems have a waste-feed cutoff?		X		No continous feed sys.
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193	~~X~~		X	
5. Are required daily and weekly inspections done? 265.194			X	When waste is stored.
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)		X		No treatment
7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)	X			

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet NA

neither are stored in tanks

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	X			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	None - Oct 30 81 last shipment			
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	X			
b. Name, mailing address, telephone number, and EPA ID number of Generator	X			
c. Name and EPA ID Number of Transporter(s)?	X			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	X			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
f. The total quantity of waste(s) and the type and number of containers loaded?	X			
g. Required certification?	X			
h. Required signatures?	X			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. _____

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____

PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
Is waste packaged in accordance with DOT regulations? (required prior to movement of hazardous waste off-site) 262.30	X			based on company's verbal answer of "yes"
Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	X			based on company's verbal answer of "yes"
If required, are placards available to transporters of hazardous waste? 262.33	X			based on company's verbal answer of "yes."

On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box ☒ and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision

a. Is each container clearly marked with the start of accumulation date?				
b. Have more than 90 days elapsed since the date inspected in (a)?				
c. Do wastes remain in accumulation tanks for more than 90 days?				
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40			X	I informed company of this requirement

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste? 262.50		X		based on company's verbal answer of "No"
(If answered Yes, complete the following as applicable.)				
Exporting Hazardous waste, has a generator:				

RCRA Inspection Report

EPA Identification Number: MID 059723867

Installation Name: Parker Chemical Co

Location Address: 322 W. Main St

City: Morenci State: Mi

Date of inspection: 8/29 Time of inspection (from) 10:15 (to) 11:40

Person(s) interviewed	Title	Telephone
Richard Speed	Env. Spc	

Inspector(s)	Agency/Title	Telephone
T. Bailey	MDNR	517-322-1602
R. Kolzow	USEPA	

Installation Activity (mark only one box) — Inspection Form(s)

X	Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	A
II	Treatment/Storage/Disposal (no generation or Transportation)	A
II	Generation and Transportation	B, C
II	Generation only	B
II	Transportation only	C

Company is an wholly owned subsidiary of Ford Motor Co

They produce metal coatings and treatments. The major portion of their waste is off-spec batches of raw materials or product returned by customers.

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	[X]	storage in containers	I
S02	[ ]	storage in tanks	J
T01	[ ]	treatment in tanks	J
S04	[ ]	storage in surface impoundment	K,F
T02	[ ]	treatment in surface impoundment	K,F
D83	[ ]	disposal in surface impoundment	K,F
S03	[ ]	storage in waste pile	L
D81	[ ]	disposal by land application	M,F
D80	[ ]	disposal in landfill	N,F
T03	[ ]	treatment by incineration	O/P
T04	[ ]	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	[X]	APPENDIX	GN
TRANSPORTER	[ ]	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?		✓		
b. Facility expansion?		✓		
c. Change of owner or operator?	✓			
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?				Most are family they need to make the material or see. See Comments.
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?				see above
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				see above
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance? or		✓		ADT Alarm system
b. i. Artificial or natural barrier around facility? and	✓			
ii. Controlled entry?	✓			
c. Danger sign(s) at entrance?	✓			
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	✓			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	✓			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?	✓			checked by AOT
ii. safety and emergency equipment?	✓			
iii. security devices?	✓			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	✓			
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	✓			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	✓			
d. Are areas subject to spills inspected daily when in use?			✓	
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	✓			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	✓			
ii. the name of the inspector?	✓			
iii. a notation of the observations made?	✓			
iv. the date and nature of any repairs or remedial actions?	✓			
5. Do personnel training records include: 265.16				
a. Job titles?	✓			
b. Job descriptions?	✓			

	YES	NO	NI	Remarks
c. Description of training?	✓			
d. Records of training?	✓			
e. Did facility personnel receive the required training by 5-19-81?			✓	
f. Do new personnel receive required training within six months?	✓			New personel receive one-on-one training
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?				
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	✓			
b. No smoking signs?	✓			
c. Separation and protection from ignition sources?	✓			

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	YES	NO	NI	Remarks
Maintenance and Operation of Facility: 265.31				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
2. If required, does the facility have the following equipment: 265.32				
a. Internal communications or alarm systems?	✓			
b. Telephone or 2-way radios at the scene of operations?	✓			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

water available - city mains

3. Testing and Maintenance of Emergency Equipment: 265.33				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓			Tests test sire, ADT does other
b. Is emergency equipment maintained in operable condition?	✓			
4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	✓			
5. Is there adequate aisle space for unobstructed movement?	✓			
6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	✓			

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	✓			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	✓			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	✓			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	✓			
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	✓			

	YES	NO	NI	Remarks
Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	✓			
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?		✓		

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)				Copy Does not accept waste from outside
b. Are records of past shipments retained for 3 years?				
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	✓			
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?				All Storage
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	✓			
***iii. A map or diagram of each cell or disposal area				

** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.

*** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				see comments
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?				see comments.
v. Reports detailing all incidents that required implementation of the Contingency Plan?				None have occurred.
vi. All closure and post closure costs as applicable?	✓			
4. Availability of Records 265.74 Are all facility records required under 40 CFR Part 265 available for inspection?	✓			
5.**Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?				
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				N/A

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES	NO	NI	Remarks
1.	Are containers in good condition? 265.171	✓			
2.	Are containers compatible with waste in them? 265.172	✓			
3.	Are containers managed to prevent leaks? 265.173	✓			
4.	Are containers stored closed?	✓			
5.	Are containers inspected weekly for leaks and defects.	✓			
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	✓			One drum only.
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	✓			separate end of bldg
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	✓			

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	✓			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	1/0			
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	✓			
b. Name, mailing address, telephone number, and EPA ID number of Generator	✓			
c. Name and EPA ID Number of Transporter(s)?	✓			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	✓			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
f. The total quantity of waste(s) and the type and number of containers loaded?	✓			
g. Required certification?	✓			
h. Required signatures?	✓			

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. none

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. none

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	✓			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	✓			
3. If required, are placards available to transporters of hazardous waste? 262.33			✓	

4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box ☐ and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision

	YES	NO	NI	Remarks
a. Is each container clearly marked with the start of accumulation date?	✓			
b. Have more than 90 days elapsed since the date inspected in (a)?				Some
c. Do wastes remain in accumulation tanks for more than 90 days?				Some
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	✓			

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	✓			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	Remarks
1. Has the installation imported or exported Hazardous Waste? 262.50		✓		

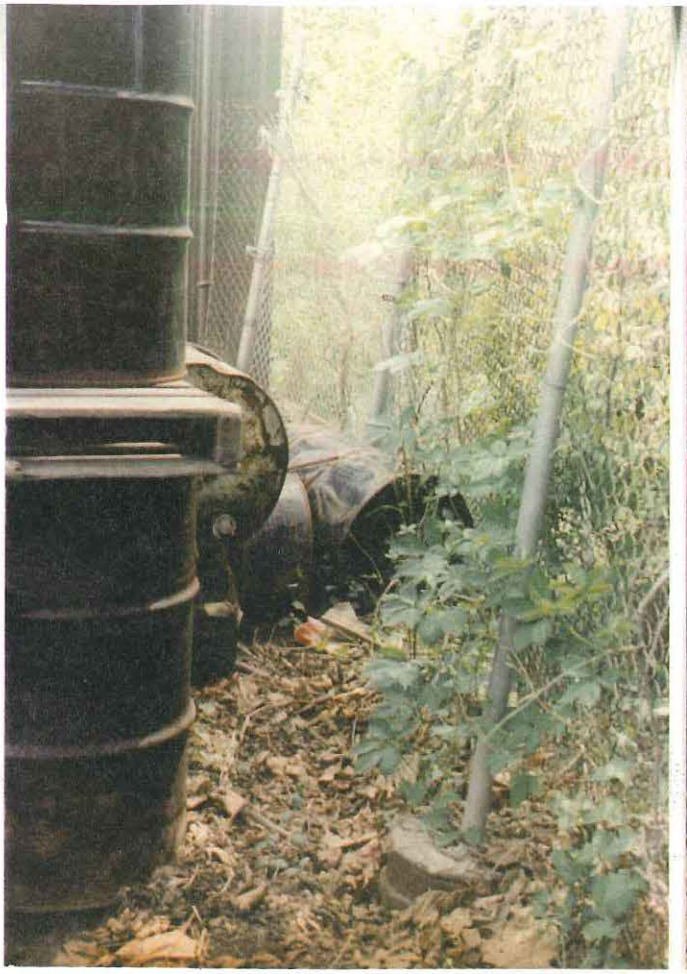
(If answered Yes, complete the following as applicable.)

a. Exporting Hazardous waste; has a generator:


JUNK
ECOVERY
DRUM


712478


LEAKER
BOTTOM




JUNK
FLAMMABLE


NITRIC
ACID


JUNK


JUNK

Staff Report

Occidental Chemical Corporation
Parker Surface Treatment Products Division
322 Main Street
Morenci, Michigan

Linda Koivuniemi, DNR Air Quality Division, conducted a RCRA inspection at Occidental Chemical in Morenci on May 14, 1982. There were numerous violations of the RCRA regulations surfaced as a result of that in inspection. Linda noted that the storage area was generally in poor condition with what appeared to be chemical residues on-the ground surface, leaky drums and indications of overland runoff from the storage area to Bean Creek on the west property line of the company. As as result of these observations, Linda contacted the District I Water Quality Division office on May 17, 1982 and dicussed the potential groundwater and surface water problems associated with the site with the writer. We agreed to meet at Occidental Chemical on May 18, 1982 so that I could evaluate the situation with regard to potential groundwater and/or surface water contamination and possible violations of Act 245, P.A. 1929, as amended.

May 18, 1982

I met with Linda and she furnished me with a copy of the company's Part A RCRA application and reviewed her observations of May 14, 1982. Linda and I then went to Occidental Chemical and met with Mssrs. Richard Fredrick and Richard Speed and advised them that Linda was doing a follow-up/continuation regarding the RCRA inspection and that I would be inspecting the site relative to possible Act 245 violations. We requested, and received, permission to inspect the drum storage areas, take pictures and possibly collect some samples off the ground in the storage areas. Permission was granted verbally by Mr. John Kashner, Manager-Manufacturing, Occidental Chemical.

All the drum storage areas were undiked and four of the six areas were on stone or unprotected earth. With reference to the attached site drawing (attachment I), the storage areas are described below:

1 - Located at the northwest corner of the manufacturing building on a crushed stone base. This area contained an estimated 200 drums ± 5%. Approximately 10% of the drums were damaged but there were only minimal indications of any leakage onto the ground. At least one drum had the outer metal completely rusted out and the remaining "drum" was empty.

2 - This area is located just north of the new drum storage building on a concrete pad. The pad was covered with "dirt" and leaves. There were approximately 1536 drums ± 5%, of which about 25% appeared to be damaged and/or leaking. Several drums had chemicals on the outside indicating leaks from the drums. There was "oilly" residue soaked into the leaves and dirt on the pad

and indications along the fence line that some minor runoff might have occurred to Bean Creek. The drum stacks were haphazard and disorganized with some of the top drums falling over against adjacent stacks. There was liquid on the ground inside the drum stacks but there was no way to get into the area.

3 - The fence on the north side of the plant driveway bisected a group of waste drums referred to as area 3. These drums were stacked on crushed stone and there were several discolored areas indicating leakage from the drums. There was an estimated 400 drums ± 20% in this area with about 40% of the drums opened, damaged or leaking.

4 - This area was inside the warehouse on the east side of the property near the shipping/receiving area. No estimate of the number of drums was made at this location.

5 - This area was north of location #2 and contained approximately twelve drums of waste materials. In addition there were several "empty" drums stacked on their sides to the east of the waste drums. These drums had contained chromic acid and residual pools of brownish liquid from the rinsing operations were collected in the drum grooves. At least two of the waste drums had no tops and there was no concrete pad under any of the drums. The drums were resting on bare ground. This area was not identified in the RCRA Part A form.

6 - This area located just south of the new storage building was not identified on the RCRA Part A either. The estimated 15 waste containing drums were stacked next to some empty drums on the concrete.

The total estimated drum inventory on hand on May 18, 1982 was as follows:

Area 1 - 200 ± 5%
Area 2 - 1536 ± 5%
Area 3 - 400 ± 20%
Area 4 - not estimated
Area 5 - 12
Area 6 - 15
Total drums - 2163

Note: The ± range on the estimate is to compensate for interior voids in the drum stacks and irregular stacking.

Following our inspection of the drum storage areas, Linda and I met with Mssrs. Fredrick and Speed and we discussed various aspects of RCRA and Act 245 regulations. I told the company respresentatives that the storage

areas had to be cleaned up and that it would probably be required that they conduct a hydrogeological investigation at the site to determine if any groundwater contamination had occurred at the site. This advisory was based on the drum storage area conditions and on the past practices the company was using to drain their tank truck loading hoses.

The outside loading area for tank truck shipments is located in about the middle of the west side of the manufacturing building. For at least the last 10 years the company has been draining and rinsing delivery hoses into a stainless steel drum sunk partially into the ground. Reportedly, the bottom had been cut out of the drum and the drum then filled with crushed stone. The waste material being discharged to the drum would have contained primarily chrome, nickel and zinc phosphate compounds. I advised the company that this practice was illegal and that they should cease the operation immediately.

In our discussion with Mssrs. Fredrick and Speed, I found out that the drums were primarily "product no longer usable" that had been returned to Occidental by their customers. The drums in the yard, which they contented were $\pm$ 900 in number, had been accumulated reportedly since April 1981. The company had a contract with Chemical Waste Management in Alabama and would be shipping the drums out after characterisation was completed. Monies had already been allocated and the lab work was reportedly done. The company expected to ship the first load out May 26, 1982 and be completed with the removal by the end of June 1982.

The company was characterising the materials in the drums by company drum code. The code is a nine digit number; the first of which is the last number of the year the product was manufactured, the second is the plant area in which the product was manufactured, and the last four, the product batch number. The company was not sampling each drum but would randomly select single drums of the same code number to analyse. They were not running complete analysis on the drum samples but were analysing for characteristics, i.e., percent phosphate, that should have been in that product code number. If the analyses was within acceptable analytical error, they were assuming no other material had been introduced into the drum. The company, in reality, had no way of knowing if the drums had been tampered with or what was in the drums when they accepted receipt of them and put them in the storage yard. Many of the drums were so badly rusted that no product code or company name could be found.

In the future the company intends to store returned product in a "quarantine area" in building H. The drums will remain in this inside storage area until they are analysed and the company decides whether to return them to "stock", rework the material into a different product, or dispose of the drum contents as a waste. Waste drums will be stored in the new storage building with a maximum inventory of 80 drums.

After our discussion with Mssrs. Fredrick and Speed, Linda and I went back out to the storage area to take pictures and collect samples. I collected three samples in the storage area. These samples were collected by scrapping the ground surface and depositing the material into a clean glass jar. The samples were transferred to the Environmental Services Division Laboratory on May 19, 1982. Custody was maintained on all samples. The sample locations and results were as follows:

Sample #	Location	Cyanide mg/kg	Cadmium mg/kg	Chromium Mg/kg	Copper Mg/kg
1	Northwest area of area #2	---	3	4,700	100
2	Southeast area of area #2	---	k2	2,500	140
3	Southcenter area of area #3	NAV	k2	37	190

	Nickel (Mg/kg)	Lead (Mg/kg)	Zinc (Mg/kg)	Oil and Grease (Mg/kg)
1	67	100	3800	30,000
2	170	170	4800	54,000
3	30	14	170	1,300

	PCB (A-1242) (µg/kg)	PCB (A-1254) (µg/kg)	PCB (A-1260) (µg/kg)
1	19,000	k2000	k2000
2	2,500,000	k2000	k2000
3	6,500	k2000	k2000

Note: k means "less than"
NAV means "requested analysis not available"

May 27, 1982

I returned to Occidental Chemical on May 27, 1982 with Linda. The purpose of the visit was to collect some "random" drum samples from the storage are as we were not equipped with the necessary materials for drum sampling during our May 18, 1982 inspection. We met with Mssrs. Kashner and Fredrick again and also with Mr. Lee Huffaker. Samples were collected from four drums and transferred to Linda for transmittal to the ESD laboratory. Custody was maintained on all samples. I collected duplicate samples for the company at the same time. The locations and analytical results for the four samples were as follows:

Sample #1 - This sample was collected from a 55 gallon drum marked "Junk Solvent" located in storage area number 2. The dark colored liquid was too "thin" to collect in a sampling tube, so I lowered a small bottle into the drum and transferred the sample

to a clean glass container. The liquid had a "solvent" type odor and Mr. Huffaker indicated that it probably contained waste solvent used by Occidental. Analysis of the sample showed:

Flash point - less than 70° F
pH - 3

The material was characterised by the ESD laboratory as being a "mixture including ethyl benzene and xylenes".

Sample #2 - A highly corrosive red liquid was sampled from a 55 gallon drum located in area number 2. The liquid surface etched the metal tube, presumably aluminum, that we were using to collect the sample. The sample was collected in a polyethylene bottle supplied by Occidental Chemical due to their concern for possible presence of hydroflouric acid. The drum, labled 615473, was identified by the company as PARCO cleaner. Analysis of the sample showed:

pH - 1

Sample #3 - A sample was collected from a 55 gallon drum in area number 3 labled Ethylamine 70%. The sample had a strong ammonia odor despite the fact that Mr. Fredrick had opened the drum in April 1982 to relieve pressure build-up in the drum. The sample was collected using a metal tube and deposited in a Occidental Chemical supplied polyethylene bottle. Analysis of the sample showed:

Flash point - less than 40° F
pH - 14

The material was characterised by the ESD laboratory as containing a trace of xylene.

Sample #4 - A 55 gallon drum covered with a wax like substance on the outside was located in area number 3. A sample of the brown-yellow viscous liquid was collected using a metal sample tube and deposited in a clean glass bottle. Analysis of the sample showed:

Flash point - approximately 190° F
pH - 3

ESD laboratory characterisation of the sample indicated the presence of toluene, ethylbenzene and xylene. Analysis for PCB showed:

A-1242 - less than 4000 µg/l
A-1254 - less than 2000 µg/l
A-1260 - less than 2000 µg/l

Arter we collected the drum samples we met with Mssrs. Kashner, Fredrick and Huffaker to discuss additional RCRA information that Linda needed. During our disucussion, Lee Huffaker indicated that he felt some of the stored material would not have needed to be manifested under RCRA because it had been returned prior to November 19, 1980 when RCRA regulations took affect.

June 22, 1982

Linda and I met with Dick Fredrick, Lee Huffaker and John Kashner to discuss the PCB results obtained in our May 18, 1982 samples, collect additional RCRA information and inspect the storage area that Linda discovered during her June 15, 1982 inspection.

Linda once again requested a copy of Occidental's operating record under RCRA. The company indicated they were still working on putting the information together. The record would not be done until all materials were shipped out to Chemical Waste Management. Linda then requested copies of all the waste characterisation Reports being compiled for Chemical Waste Management. The company responded by stating that about 80 drums had not been characterised yet because they could not get any markings off the drums but that samples from these drums had been shipped to the company's lab for analysis the previous week.

The company stated that the new storage area Linda had discovered behind the empty stainless steel drums in area 6, contained sample bottles from lab samples that someone had deposited in the area contrary to established procedures and two drums of liquid that no one knew anything about. The remaining drums contained "bag house" dust from the air scrubbers at the plant.

Linda and I inspected the expanded number 6 storage area. Several attempts were made to penetrate through to the waste area in question without success. We finally gained access by going along the south side of the new storage building and pushing the west property line fence back and squeezing between the fence and the drums to gain access to the west portion of area 6.

The area was generally a mess with deteriorated fibre paks of "bag house" dust having lost their contents all over the concrete pad. There were several open top drums of plastic bottles that Mssrs. Fredrick and Huffaker said were discarded lab sample bottles. When we entered the area, I could hear a hissing sound from one of the barrels. Two fibre pak type barrels with plastic liners had fallen over and the outside shell was deteriorated. Leakage from one of the fibre pak barrels had eaten through the wooden pallet it was resting on and had partially dissolved the cement at the edge of the pallet. There were definite dark colored stains leading from the storage area, under the fence and toward Bean Creek. At least two open top barrels contained rusted, disintegrated aerosol cans once containing material similar to WD-40.

Ground surface samples were collected from locations in this area as follows:

Sample #1 - Southwest of gate along west fence line--just east of fence

Sample #2 - Oilly area outside fence line about 10 feet southwest of sample #1

Sample #3 - Greenish colored runoff area inside fence about 10 feet southwest of sample #2

Sample #4 - Greenish yellow stained material below fallen over fibre pak. This area would have runoff tributary to sample site #3. Fibre pak with label still on it next to sample location indicated "corrosive" and contained brownish colored liquid

Analysis of the above samples showed the following:

Parameter	#1	#2	#3	#4
Oil and grease (mg/kg)	68,000	37,000	18,000	2,300
PCB A-1242 (ug/kg)	k200	k200	k200	k200
A-1254 (ug/kg)	k200	k200	k200	k200
A-1260 (ug/kg)	k200	k200	k200	k200
Cadmium (Mg/kg)	5	7	6	3
Chromium (Mg/kg)	640	1,000	14,000	36,000
Copper (Mg/kg)	1,100	2,300	2,100	400
Nickel (Mg/kg)	31	250	61	280
Lead (Mg/kg)	310	330	290	220
Zinc (Mg/kg)	11,000	57,000	12,000	3,600

Note: k means less than

Since the fibre pak barrels and the stainless steel drum marked "nitric acid", source of earlier noted hissing sound, could not be safely sampled during our inspection, the company was requested to collect samples for us once the barrels were in recovery drums and the "nitric acid" drum was depressurised.

Mssrs. Kashner, Fredrick and Huffaker were instructed that this "new" storage area must be cleaned up immediately. They were also told that any outside storage of raw materials or wastes must be curbed and/or diked and must be on an impervious pad.

We asked Mssrs. Kashner, Fredrick and Huffaker about storage or use of PCB's on the Occidental property. They emphatically denied the presence of any PCB in either hydraulic or electrical systems and stated that the systems had been tested and showed no detectable PCB. We then informed them of the PCB analysis from our May 18, 1982 samples. After some dis-

cussion, the company personnel reluctently agreed that someone could have returned a drum to them that contained other than their product and that in reality they had no way of knowing what was in all the drums in the storage area.

I told the company that we wanted them to do a study of the sediments and water in Bean Creek above and below their facility for organics, phosphates and metals and a hydrogeological study to determine groundwater quality and flow direction. The study plan was to be internally discussed with Occidental's corporate environmental personnel during a planned July 12-13, 1982 environmental audit with a letter being sent to us by July 23, 1982 committing to the study and giving us a date for a plan submittal. The south storage area (#6) that we had sampled was to be completely cleaned up by July 16, 1982.

Mr. Richard Speed from Occidental subsequently contacted the writer by telephone on June 24, 1982 and advised me that the environmental audit had been delayed until July 19-20, 1982. We agreed therefore, to meet with personnel from the Morenci facility and Occidental corporate staff on July 9, 1982 to discuss the requested studies. This agreement and our study requirements were confirmed by letter of June 29, 1982 from the District I office.

July 9, 1982

Linda Koivuniemi and I met with the following personnel from Occidental Chemical Corporation on this date:

John Kashner, Plant Manager, Morenci
Richard Speed, Environmental Engineer, Morenci
Mike McLain, Project Engineer, Morenci
Robert Schuttler, Director, Environmental Health and Safety, Niagra Falls, N.Y.

Neither Lee Huffaker, Chemist, or Richard Fredrick, Production Superintendent, for Morenci were in attendance at this meeting.

Several items were discussed during our meeting. A summary of each major item follows:

PCB Sources - We verified with the company where we collected our May 18, 1982 samples.

The company is still unaware of any possible PCB sources on the site. Mr. Schuttler indicated that Occidental had collected a composite core of about the first six inches of soil depth in roughly the same area we collected our surface sample and found no detectable PCB. I stated that I did not see how this negated our data at all since their sample was from a different location and a vertical soil composite,

whereas our sample was scrappings of the organic layer on top of the concrete pad.

Site Clean up - The number six storage area clean up was completed by June 28, 1982. All on-site waste drums from all storage areas have now been either moved to inside storage or shipped off-site to Chemical Waste Management. The company has manifested 1300 drums for disposal. Of these, the company stated 400 to 500 drums were waste and the rest were bag house dust.

Company officials now indicate that the drum storage existed for about 18 months, placing the start of accumulation around January 1981. This is the third variation of an accumulation start date that the company has indicated.

The company agreed that a secure method of determining if a returned drum had been opened was necessary. They are working on devising a drum seal method for future shipments.

Bulk loading facility - The only materials that were bulk loaded into tank trucks were Bonderites. These materials would have contained metallic phosphate compounds. The hose drainage and wash out water from the bulk loading operation is the material discharged into the ground through the previously described stainless steel drum at the loading facility.

On-site organics would have been contained in various solvents and Bonderlub compoundings.

Hydrogeological and Bean Creek Studies - Although Mr. Kashner has implied all along that the Morenci plant supported our request for a groundwater study, Mr. Schuttler indicated that he did not feel that such a study was absolutely necessary. We showed him the pictures taken of the site and explained our concern relative to the leaky drums and the bulk loading facilities. Mr. Schuttler indicated he would reevaluate the need for a hydrogeological study and respond to us by August 4, 1982 as to the company position regarding this study.

Mr. Schuttler was concerned about the validity of sediment samples and interpretation of any resulting data from the requested Bean Creek study. He indicated that Occidental had been involved in similar requests at other facilities and the merit of the study was always questionable when it was completed. I volunteered that our Biology Section had been involved in numerous creek sediment studies and never seemed to have a problem collecting the samples or interpreting the resultant data. Finally, I volunteered that we would do the creek study and the company could do the groundwater study.

Linda requested the samples that the company saved for us from the fibre paks and stainless steel drum from area 6 (ref. June 22, 1982 inspection). The samples could not be located but the drum and fibre paks were still on-site. Linda accompanied Mr. Speed while company personnel collected new samples for us. The samples were transferred to the writer and were transported to the Environmental Services Laboratory for analysis. Custody was maintained on the samples. Sample locations and analytical results were as follows:

Sample XX1 - brownish yellow liquid from 3/4 full fibre pak drum

Sample XX2 - brownish yellow liquid residue from second fibre pak drum that had been in area 6

Sample XX3 - liquid contained in drum marked "nitric acid"

Parameter	#1	#2	#3
Total Flouride (mg/l)	7,000	5,200	1.7
pH (run w/pH paper)	0.1	0.1	0.1
Cadmium (ug/l)	k20	k20	60
Chromium (ug/l)	21,000,000	21,000,000	9,000
Copper (ug/l)	21,000	14,000	1,700
Nickel (ug/l)	270	190	730
Lead (ug/l)	75	k50	190
Zinc (ug/l)	720	1,300	3,000
PCB (ug/l) A-1242	k5,000	k5,000	k5,000
A-1254	k2,000	k2,000	k2,000
A-1260	k2,000	k2,000	k2,000
Scan 1 (Purgeable Halocarbons)	---	---	NOS
Scan 2 (Purgeable Aromatic Hydrocarbons)	---	---	NOS
Scan 4 (PCB and Organochlorine Pesticides)	U	U	U

Note: k means less than
U means undetected
NOS means "No sample received suitable for analysis requested"

In addition to the liquid samples, a sample of "bag house dust" was collected to verify its contents. The company stated the material should contain sodium metasilicate, sodium phosphate compounds, soda ash and possibly caustic. Analysis of the sample showed the following:

Total phosphate (mg/kg) - 120,000 NA
Silicate (leach)(mg/kg) - 13,000 NA
Cadmium (mg/kg) - k2
Chromium (mg/kg) - k5

Copper (mg/kg) - 1,800
Nickel (mg/kg) - 1,600
Lead (mg/kg) - 23
Zinc (mg/kg) 36

Note: k means less than
NA means "analytical method has not yet been approved by laboratory"

July 27, 1982

Jack Wuycheck and Dennis Swanson from the Biology Section met the writer in Morenci to do a stream study in Bean Creek. Sediment and water samples were collected upstream and downstream of Occidental Chemical. A report pertaining to this study is being complied by Jack Wuycheck.

While we were doing the study we noted two discharges from Occidental to the river and two sewage discharges from the Morenci system were noted. The north (upstream) discharge from Occidental changed colors several times while we observed it and collected samples. Color variations were grey, white, brownish and purple at various times.

After we collected our stream samples, we proceeded to Occidental Chemical and contacted Mssrs. Kashner and Fredrick about the discharge. We described the location where the pipe was entering the river and neither Mr. Kashner or Mr. Fredrick had any idea what the source could be. They were invited to go out and look at the discharge and we left the office and proceeded toward the creek. On the way, Mr. Fredrick disappeared to get a key for the gate that they forgot had to be opened. He joined us shortly afterward with a maintenance man with a drawing of part of the sewer system serving Occidental (see attachmentII). Although the drawing is no longer accurate relative to buildings shown and it is not to scale, it did show that the sewer system could by-pass to the Creek. We located IMH #106, opened the cover and discovered that the system was overflowing. The company then contacted Morenci DPW to have someone come out and stop the by-pass.

While we were waiting we pulled the adjoining cover and found the "regulator" chamber. The sewer system serving Occidental is part of the Village system, which is a combined sewer system. This particular "regulator" consisted of a slide-gate at the outfall end of the chamber with a two section low head dam/backwater gate arrangement on the west side of the chamber. We found a long metal pipe on the company property and tried to push the backwater gates shut but they would not stay closed. I noted that water was flowing through the slide-gate opening along only about 25% of the base. I stuck the pipe down along the gate base to see if it was blocked and dislodged a considerable amount of greyish colored sludge from in front of the gate. The flow immediately filled the whole gate base and the by-pass to the Creek stopped. Sludge similar in physical characteristics to that found in the gate chamber had also been noted previously at the outfall to Bean Creek.

Company personnel indicated that Morenci personnel routinely check the by-pass structures in the system following a heavy rainstorm. This was confirmed by the DPW person responding to the company's earlier telephone call. However, this by-pass and the two other by-passes on the same sewer system noted earlier, indicate that the Village surveillance, and company surveillance, of the sewer system may leave something to be desired since it had not rained for a couple weeks. During my discussion with Mr. Kashner, he indicated that Mr. Schuttler had contacted him and needed some more time prior to our previously proposed August 4, 1982 meeting. We agreed to wait until the report was available on our Bean Creek study, about 3-4 weeks, before meeting again.

Conclusions

1. The materials stored in the drum storage areas at Occidental Chemical Corporation in Morenci were in full or in part an "other waste material" as defined in section 261.2(b) of the Resource Conservation and Recovery Act (RCRA).

2. The materials stored in the drum storage areas at Occidental Chemical Corporation in Morenci were in full or in part a "hazardous waste" based on the following:

   a. Ignitability (ref. 261.21(a)(1)) - The flash point of drum samples #1 and #3 collected on May 27, 1982 were less than 70°F and less than 40°F respectively. Any liquid waste with a flash point less than 140°F is considered ignitable.

   b. Corrosivity (ref. 261.22(a)(1)) - The regulations state that an aqueous solution that has a pH less than or equal to 2 or greater than or equal to 12.5 is considered to be corrosive. Drum samples #2 and #3 collected on May 27, 1982 showed a pH of 1 and 14 respectively. The pH of all three drum samples collected on July 9, 1982 was indicated as 0.1.

   c. Listed waste under Subpart D (ref. 261.31) - Sample #1 and #3 from May 27, 1982 showed a "mixture including ethyl benzene and xylenes" and a trace of xylene respectively. Both xylene and ethylbenzene are listed under F003 in section 261.31.

3. The surface samples collected in storage area #2, #3 and #6 on May 18, 1982 and June 22, 1982 coupled with our visual observations of the storage areas show that the company allowed the discharge of materials from the stored drums onto the ground surface, contrary to the provisions of the RCRA regulations and section 6(a) of Act 245, P.A.1929, as amended, in that there was no designed protection afforded to the groundwaters or surface waters of the state that would preclude runoff from these storage areas from contributing a substance which is or may become injurious to the beneficial uses and/or aquatic environment associated with those waters.

4. Our observations of the bulk loading facilities and the company reported practice of draining hoses into the ground via the previously mentioned stainless steel drum indicate that Occidental Chemical Corporation is in violation of section 6(a) of Act 245, P.A. 1929, as amended and also section 7(1) of Act 245, P.A. 1929, as amended, in that the company does not have a valid permit for this discharge.

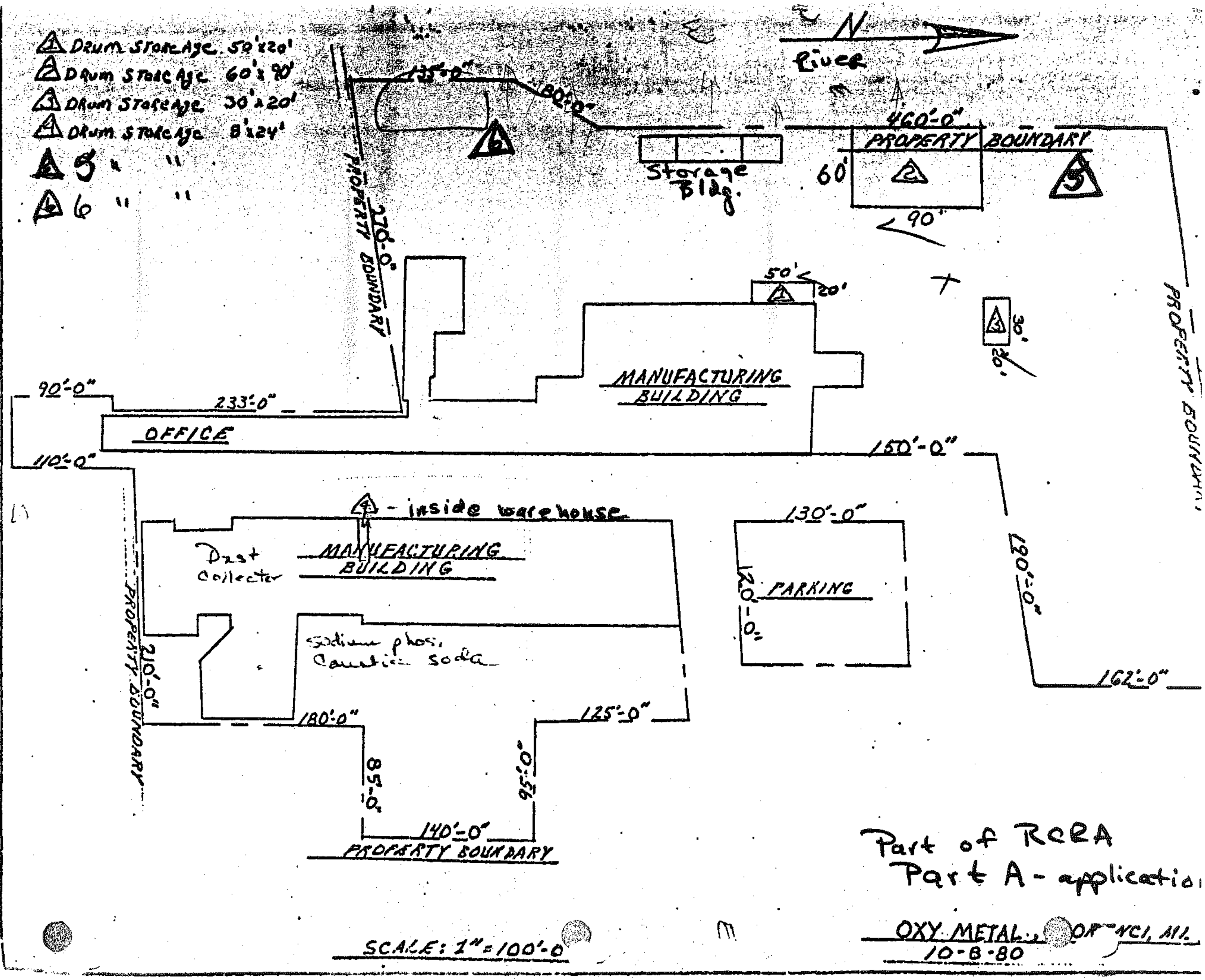
5. Occidental Chemical Corporation is in violation of Part 5 of the General Rules of the Water Resources Commission in that they were storing materials contained on the Critical Materials Register without adquate emergency containment (R323.1158) and the company did not have a Pollution Incident Prevention Plan addressing these materials (R323.1162).

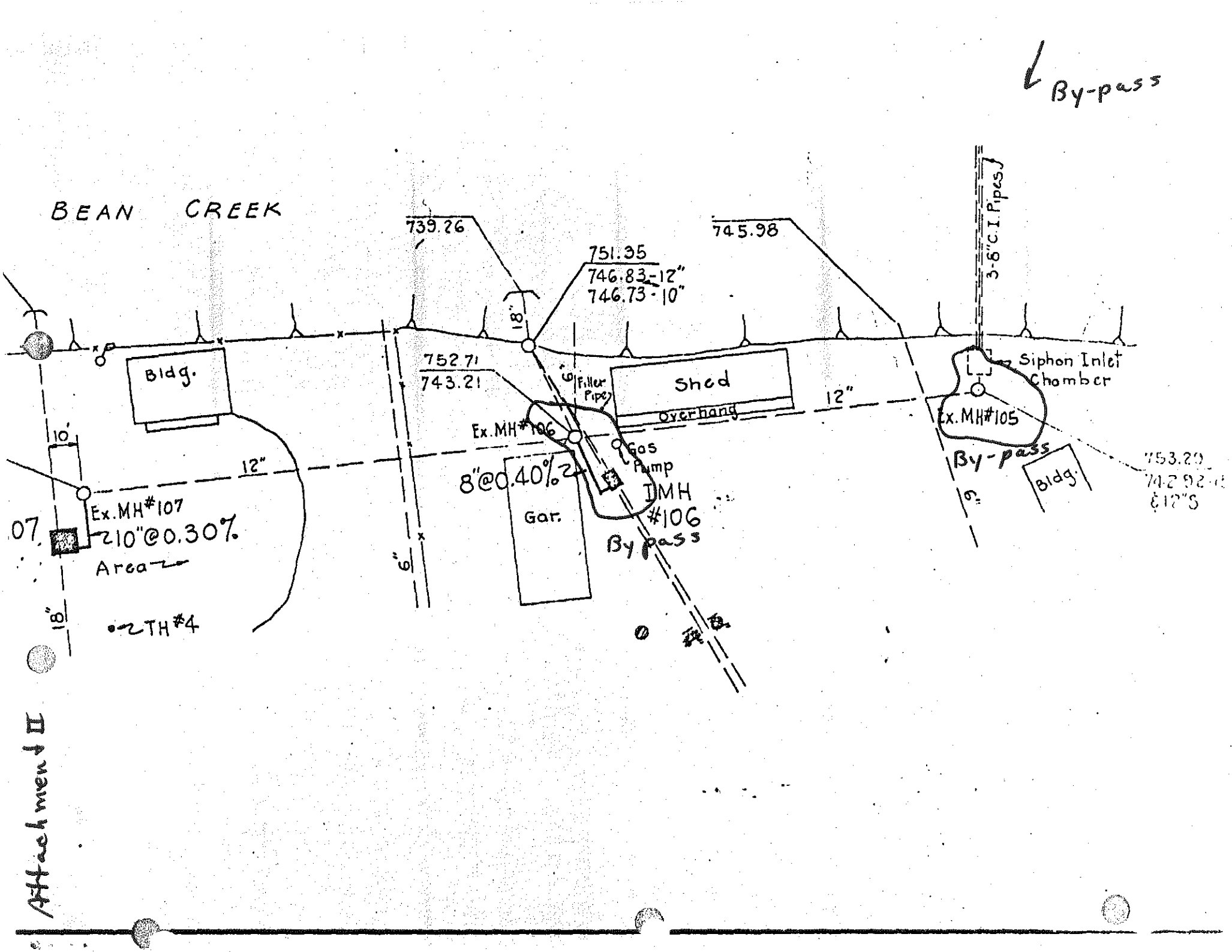
Field Work by: Linda Koivuniemi
Roy Schrameck

Report by: Roy Schrameck

sc

Copies: USEPA (2)
Lyle Rowell - DNR Environmental Enforcement Division
John Bohunsky - DNR Water Quality Division


1 DRUM STORAGE 50'x20'
2 DRUM STORAGE 60'x 90'
3 DRUM STORAGE 30'x20'
4 DRUM STORAGE 8'x24'
5 " "
6 " "
N
River
135'-0"
80'-0"
460'-0"
PROPERTY BOUNDARY
Storage Bldg.
60'
90"
270'-0"
PROPERTY BOUNDARY
50'
20'
30'
20'
MANUFACTURING BUILDING
90'-0"
233'-0"
OFFICE
110'-0"
150'-0"
4 - inside warehouse
130'-0"
Dust Collecter
MANUFACTURING BUILDING
PARKING
120'-0"
190'-0"
PROPERTY BOUNDARY
sodium phos.
Caustic soda
210'-0"
180'-0"
125'-0"
162'-0"
85'-0"
95'-0"
140'-0"
PROPERTY BOUNDARY
Part of RCRA
Part A - application
OXY METAL, MORENCI, MI.
10-8-80
SCALE: 1" = 100'-0"


BEAN CREEK
739.26
751.35
746.83-12"
746.73-10"
745.98
3-6"C.I Pipes
18"
752.71
743.21
Bldg.
Filler Pipe
Shed
Overhang
12"
Siphon Inlet Chamber
Ex.MH#105
Ex.MH#106
Gas Pump
8"@0.40%
IMH #106
By pass
Gar.
10'
12"
Ex.MH#107
10"@0.30%
Area
TH#4
18"
6"
By-pass
Bldg.
753.20
742.92
12"S
By-pass
Attachment II